

Statement of Consultation

Appendix 6

Submission Consultation: Representations

PART 1

Who was invited to make representations

PART 2

Representation Summary

All representations

PART 1

Who was invited to make Representations

The council can only make available to the planning inspector comments by respondents who provide their names and addresses. In line with the Council's Public Sector Equality Duty, the Council will not publish 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 or comments that have been seen to be inappropriate, offensive or racist have been removed.

The following specific consultation bodies were invited to make representations:-

Horsham District Council	BT Plc
Metrobus	RWE npower
Mid Sussex District Council	SE Coast Ambulance
Mole Valley District Council	
Reigate and Banstead Borough Council	
Tandridge District Council	
Surrey County Council	
Environment Agency	
English Heritage	
Natural England	
Network Rail	
Highways Agency	
Sussex Police	
Crawley CCG (NHS)	
Southern Water	
Thames Water	
The Coal Authority	
The Marine Management Organisation	
UK Power Networks	
SE Water	
Southern Gas Networks	
National Grid	
Homes and Communities Agency	
British Telecom	

The following general consultation bodies were invited to make representations:-

Albany Homes Limited	Harveys	Rydon Homes Ltd
Alliance Planning	Henry Adams	Savills L + P Ltd
Arlington Development Services	Hillread Homes (Sussex) Ltd	Scottish Widows Investment Partnership
Barratt Southern Counties	Hillreed Developments Limited	SEGRO
Barton Willmore Partnership	Home Builders Federation	Shared Intelligence
Bell Cornwell Partnership	Home Plans	Southern Housing Group
Bellway Estates	Hyde Housing Association	St Paul's Methodist Church
BNP Paribas Real Estate	J. P. Whelan Homes Limited	Standerd Life Investments
Bovis Homes Ltd	JWL Associates Limited	Stevensdrake
Boyer Planning Ltd	Keniston Housing Association	Stiles Harold Williams
CAA (Civil Aviation Authority)	King Sturge LLP	Strutt & Parker
Cameo Club	Land Securities PLC	Talk Broadfield
Charles Chuch South East Ltd	Lichfield Planning	Taylor Wimpey Southern Limited
Cliveden Properties	Miller Homes	Taylor Wimpey Strategic Land
Crawley and Gatwick Chamber of Commerce	Montagu Evans	Taylor Wimpy South West Thames
Crawley Borough Council	Moroccan Community Association	Tetlow King
Crawley Older Person's Forum	Nathanial Lichfield & Partners	The Fairway Club
Deloitte & Touche LLP	National Housing Federation	Turley Associates
Development Land and Planning Consultants	Palace Street Investments	Turners Hill Parish Council
DMH Stallard	Parker Dann	West Sussex Drug and Alcohol Action Team
DPDS Consulting Group	Paul Brookes Architects	White and Sons
Drivas Jonas Deloitte	Peacock & Smith	Woolf Bond Planning
Fairview Homes	Persimmon Homes (South East) Ltd	Addaction
FPD Savills	PH2 Planning Limited	Afro Caribbean Association (ACA)
Friends, Families and Travellers	Planning Perspectives LLP	Age Concern West Sussex
Frogmore Property Company Limited	Portchester Planning Consultancy	Ahmadiyya Muslim Association UK (Crawley Branch)
GIP	Pound Hill Residents Association	

Guinness Trust Housing Association	Roman Catholic Churches in Crawley	Alternative Learning Community Bewbush
Gulzar -E-Habib	RPS Planning Transport and Environment Ltd	AMEC Environment & Infrastructure
GVA	Crawley Community Transport	BAPS Swaminarayan Santha
Barton Willmore	Crawley Community Voluntary Service	DTZ
Black History Foundation	Crawley Educational Institute	East Sussex County Council
Blue Cedar Homes Limited	Crawley Ethnic Minority Partnership	Eastern Stream
BME Ladies Health and Social Wellbeing Association	Crawley Festival Committee	Elim Church Crawley
Bodhisattva Buddhist Centre	Crawley Homelessness Forum	Equality & Human Rights Commision
British Horse Society	Crawley Homes in Partnership (CHiP)-Tenants Database	Firstplan
British Humanist Society	Crawley Interfaith Network	Forestfield & Shrublands Cons. Area Adv Ctte
Broadfield Christian Fellowship	Crawley International Mela Association (CIMA)	Freedom Leisure
Broadfield Youth and Community Centre	Crawley Kashmiri Women's Welfare Association	Friends of Broadfield Park
Campaign for Real Ale	Crawley Mosque (Sunni Muslim) - c.f. Jamiat entry below	Friends of Goffs Park
CBRichard Ellis	Crawley Museum Society	Friends, Families and Travellers
Celtic & Irish Cultural Society	Crawley Older Person's Forum	Fusion Experience
Central Crawley Conservation Area Advisory Committee	Crawley Portuguese Association	FusionOnline
Central Sussex College	Crawley Shop Mobility	Gambian Society
Chagos Island Community Association (CICA)	Crawley Tennis Club	Gatwick Airport Limited
Chagos Islands Refugees group	Crawley Town Access Group	Gatwick Diamond
Chagossian Elderly West Sussex Group	Crawley Wellbeing Team	GL Hearn Ltd
Charlwood Parish Council	Crawley Young Persons Council	Gleeson Strategic Land
Churches Together in West Crawley	Cycling Touring Club	Gurjar Hindu Union (GHU)
Colgate Parish Council	Darlton Warner Davis LLP	Health Through Sport Action
COPE	Deloitte LLP	Heathrow Airport Holdings Limited
County Mall	Development Planning & Design Services Ltd	High Weald AONB Unit
Crawley Bangladeshi Welfare Association	Diego Garcian Society	Housing & Planning Directorate
Crawley Baptist Church		Housing 21
Crawley Borough Council		Hunter Page Planning Ltd
Crawley Campaign Against Racism		Hyde Housing Association
		Iceni
		Ifield Park Care Home

Crawley Clinical Commissioning Group
Crawley Community Relations Forum
Development Securities
Inspire Broadfield (youth group)
Ismaili Council
Iyad Daoud
Jamiat-ul Muslimeen & Quwait-ul Islam
Masjed - c.f. Crawley Mosque entry above
Jones Lang Lasalle
Kashmiri Educational and Welfare Trust
Kenneth Boyle Associates
Lewis & Co Planning South East Limited
Local Economy Action Group
Lower Beeding Parish Council
Maidenbower Baptist Church
Maidenbower Community Group
Malaika Sussex Multicultural Women's Group
(AKA Maliaka and M.O.S.S.)
Manor Royal Business Group
Michael Simkins LLP
Millat-e-Jafferiyah (Shia Muslim Mosque)
MITIE Property Services Limited
Moat Housing
Mono Consultants Limited
Montagu Evans
Muslim Women's Forum
National Federation of Gypsy Liaison Groups
New Hope Church
Newdigate Parish Council
Northgate Matters
Oakton Developments
Outreach 3 Way

Divas Dance Club
DMH Stallard LLP
Drivers Jonas Deloitte
Pegasus Group
Pembroke Residents Association
Planware Ltd.
Play England
Premier Planning Plc
Rapleys LLP
RenewableUK
RISE
Royal Mail Properties
RPS Group
Rusper Parish Council
Savills
SEBA South East Bangladeshi Association
Seva Trust
Shelter Housing Aid Centre
Shire Consulting
Sikh Community Centre Crawley & CPT
SIVA
Slaugham Parish Council
Soka Gakkai International – UK
Southern Counties
Sport England
Spurgeons
Sri Guru Singh Sabha
Sri Lanka Think Tank UK
Sri Lankan Muslim Welfare Association
St Margaret's C of E Primary School
Stanhope PLC
Stiles Harold Williams Partnership LLP

Ifield Village Conservation Area Advisory
Committee
Ikra Women & Children Learning Centre
Sustrans
Swadhyay Community Project (SCP)
Talk Bewbush
Taylor Wimpey
Thakeham Homes Ltd
Thales UK
The Clearwater Gypsies
The Gypsy Council
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 (Plus Chair of Black History Foundation
& other orgs)
United Reformed Church
Vision in Youth Collective
West and Partners
West Sussex Access Forum
West Sussex Access Forum
West Sussex Children and Family Centres
West Sussex Crossroads
West Sussex Youth Support and
Development Service
Woodland Trust

Parish of Worth, Pound Hill and
Maidenbower
Parker Dann Limited

Strutt and Parker
Sussex Action Traveller Group (STAG)
Sussex Wildlife Trust

Worth Conservation Area Group
Worth Parish Council
WRVS

WS Planning & Architecture
WYG Group
Reside Developments Ltd.
Savills
Land Planning & Development
DevPlan
JWL Associates Limited
Arora International
Development Securities
Adur Council
Brighton & Hove City Council
Chichester District Council
Coast to Capital LEP
Epsom & Ewell Borough Council
Lewes District Council
South Downs National Park
Waverley District Council
Guildford District Council
Worthing Borough Council

The following landowners with sites in the Employment Land Trajectory were invited to make representations:-

Stuart Walburn (ESA Planning) Astral Towers/The White House, Betts Way.

Maggie Williams (WS Planning and Architecture) Premiere House, Betts Way.

Wakako Hirose (Rapleys) Former County Oak Business Centre, Betts Way.

Keith Webster (Ancer Spa Ltd) Hydehurst Farm 4 Acre Site and Land to the East of the A23 and North of Manor Royal.

Nick Simpson (Nicholas Webb Architects PLC) Former GSK Site, Manor Royal.

Steve Duffy (HNW Architects) Former BOC Edwards Site, Manor Royal.

James Lacey (Vail Williams) Thales, Gatwick Road and Sergio West, Manor Royal.

Gary Hill (Elekta) Segro West, Manor Royal.

James Buckley (TP Bennett) Crawley E2 Business Quarter.

Ken Boyle (Ken Boyle Associates) Land at Jersey Farm.

Guy Wheeler (Crawley Borough Council) Wingspan Club.

Stephen Oliver (Vail Williams) Former Mercedes Site, County Oak Way.

David Hutchison (NES Consortium- Taylor Wimpey and Persimmon Homes) Forge Wood, North East Sector-employment land.

Andy Richardson (Valad) Land at Russell Way

Ben Malfroy (BNP Paribas) Land at Russell Way

Emma Andrews (BNP Paribas) Land at Russell Way

James Mclean (Scottish Widows Investment Partnership) Land at Russell Way

Kerri Hunter (Aberdeen Assets) Land at Russell Way

Ross McNulty (Valad) Land at Russell Way

Christine Tarry – Land at Little Dell Farm

Peter Willmott- Land at Little Dell Farm

Tim Hoskinson (Savills) Gatwick Green

Simon Fife (Savills) Gatwick Green

Ken Glendinning (HCA) Land at Rowley Farm

The following landowners/developers with sites in Policy H2 were invited to make representations:-

David Hutchison (NES Consortium-Taylor Wimpey and Persimmon Homes) Forge Wood

Ray Hook (Crawley Borough Council) - Breezehurst Drive, Henty Close and Goffs Park Depot.

Marcus Ball (WSCC)- Ifield Community College, Land adj to Desmond Anderson, Langley Green Primary School and County Buildings

Mr Donald- Southern Counties

Mr Steve Coggins (A2 Dominion)- Fairfield House

Mr Simon Snook (HCA)- Kilnmead Car Park and Tinsley Lane

Ms Kerri Hunter (Aberdeen Assets) Land at Russell Way

Ms Kim McGregor (Moat) Telford Place

Orestis Tzortzoglou (Development Securities) Telford Place

Mr Tim Jurdon (Arora) Crawley Station and Car Parks

Mr Sam Walker (Anglesea Capital) Land North of the Boulevard

Mr Chris Sheedy (Royal Mail Property Group) Land North of the Boulevard

Mr Adam Darby (Assael Architecture) 15-29 Broadway

Mr Chris Francis (West and Partners) Zurich House

Les Humphrey Associates - 5-7 Brighton Road

Barratt Southern Counties- WSCC Professional Centre

The following local residents, or other persons carrying out business in the Plan area were considered appropriate to invite representations from:-

Graham Berry
Mr D Hewerdine
Mrs S. Chick
Mike Reed
Sarah Smith
Miss V Kirby
Claire Rigiore
Mr D Phillips
Brian McLaren
J Hopcroft
Mrs J Gould
Bill Scatterly
Ruth Ganz
Mr DR Withall
Mr MJ Steward
Colin Maughan
Susan Bradford-Smart
Tony Fullwood
L.E.Crawford
Mr & Mrs Champion
Mrs P R Haworth
Ken Scott
Mr & Mrs Frith
Mr A.J.Pelling
Mrs Sue Coole
Mrs. F McCausland

P & S Wynne
Pat & Bill Chalk
Mr Albert Jordan
Mrs. P Botting
Ishtiaq Ahmed
Martin Cowles
S Zambuni
Mrs Jo Mulville
Andrew Sander
Mr & Mrs Lovett
Mr & Mrs Corsini
Mr & Mrs Benn
Mrs. M. Corali
WM Constable
Mr D Hughes
Mr. & Mrs. Mamo
Mrs Smith
Mr F Day
Mr & Mrs Baker
B Coleman
Mrs Russell
Mr Russell
Ms Russell
EJ Heed
Mrs J Bovis
Mr & Mrs Warren

Mr & Mrs Saunders
Mr H Polkey
Mr & Mrs Arnett
Mr & Mrs Upton
Mrs LL Whitfield
Mrs. J R Mitchell
J Kite
Mr and Mrs Thornback
Mr Marriott
Mrs Macey
Mrs Woodings
Mr & Mrs Chalk
Ken Holford
Mr & Mrs Sharma
Mr & Mrs Hartwell
Mr H Djabellah
Theresa Stevens
Mr & Mrs Smith
Mrs I Wakeham
Jenny Withall
Sharon Correa
Sharon Brumwell
Sharon Vygus
Mrs S Veaney
Sharon Harris
Nelson Reid

Ms L Flay
Mrs Harrington
Katie Vella
Iryna Varvanina
Mr Vaidya
Mr R S Upton
Patricia Upham-Hill
Charles Jones
T Pawlak
M Wright
Miss Tracy Poynter
Tracey Gillett
Tracy Jones
Tracy Clarke
Tracey Wesson
Tracey Leicester
Tracey Coleman
Tony Sutton
Toni Smith
Thomas James Whittington
Tom Familton
Thomas Carney
Tom Woolner
Natalie Tippett
Tina Wort
Tina Thrift
Tina Patel
Priscilla Lambert
Emma Thrift
Coral Thompson
Thomas Peckham
Tom Pashley

J Evans
Rob Horton
Clare Loader
M B Lanham
Mrs Jenny Lakeman
Roy Howard
Lynn Howard
Karen Tankard-Fuller
Timothy Caig
Amanda Whale
Kim Gordon
Mrs Teresa Perrott
Terry Beavis
Mr Terry Wheller
Jake Hawkins
Chay Sharp
David Sharp
Ellice Sharp
Patricia Sharp
Tom Doyle
Terry Stanley
Tracey Bennett
Taylor Church
Tara Petty
Tanya Bunn
Tanya Sladovich
Tadeusz Jasko
T Pool
Tracey Cox
Sylvia Handy
Angela Heath
Mrs Siyar

Verity Colbert
Mr & Mrs Wall
Stella Daff
Dtella Makey
Staum Parrett
Charis Atkinson
Stacy Malin
Sharon Spice
Stacey Rose
Nina Spence
Sophie Davies
Sophie Airey
Sophie Harding
Adam Richard Jasko
Abi Watkins
Abby Allen
Aaron Lumley
Mr Alexander Collins
Antonio Percudani
Mrs Audrey McKown
Alan Hollman
Sam Brown
Jennifer
Rhys Miller
A and P Smith
Alan Kenward
Kathleen Kenward
Ishtiaq Ahmed
Alexander Wilbourn
Adam Parker
Adam Foxley
Adam Jasko

Mrs S Knight
Morgan O'Flanagan
Susan Lester
Susan Smyth
Sue Carraher
Sue Arnold
Susan March
Sunita Singal
Sumra Ahmed
Sumi Patel
Sue Mason
Miss Susan King
Natacha Wilson
Karla Strudwick
Sarah Dowdall
Sandra Foxton
Stewart Neate
Mr Steven Soper
Steve Taylor
Stephen Rivers
Stephanie Cox
Stella Daff
Dtella Makey
Staum Parrett
Charis Atkinson
Stacy Malin
Sharon Spice
Stacey Rose
Nina Spence
Sophie Davies
Sharon Terry
Leandro Correa

Suzanne Davies
Suzannah Guy
Sophie Airey
Sophie Harding
Colin Snook
Dawn O'Dwyer
Sophie Eaton
Sam Bouglas
Sharon Richardson
Sarah-Jane Willis
Siobhan Miller
Claire Collins
Doreen Simpson
Simon Thrift
Joan Thrift
Simon Freeman
Simon Douglas
Simon Randall
Simon Hickey
Simon Biffen
Sim Sidhu
S.Newbury
Sherwin Scott
Michelle Holmes
Darren Williams
Shelley Williams
Malcolm Woodhead
Sheila Woodhead
Shazia Ahmed
Shazia Sidat
Gwen Poyton
Sharon Ottley

Alison Heine
Perry Doherty
Alison Shackell
S. Garvin
Serene Cottee
Selina Wragg
Mrs S E Cooke
Sean Reynolds
Steven Woods
Zoe Grimshaw
Amanda Bounds
Samuel Beach
Andy Marriott
Mrs Sarita Arya
Mrs. Renata Hegedusne Sarik
Sarah Piper
Miss Sarah Carter
Sarah Newman
Sarah Lee-Fisher
Sarah Greenwood
Sarah Parker
Sara Ahmed
Sara Doyle
Martin Santaniello
Sandra Mehmet
Sam Judge
Sam Bateman
Samantha Haines
Sam Cook
Clare Salvage
Karen Salter
Sally Croft

Sally Thorn
Sally Osmond

Sally Sanders
Mrs Sabeen Mansoor
Sarah Keen
Mr Ryan Tate
Ryan Page
Ryan Jenkinson
Bob Woods
Russell Milton
Russell Sharp
Russ Mitchell
Rukiya Maxwell
Pamela Ruel
Reniece Robinson
Richard Page
Daniel Stannard
Josie Stannard
Libby Stannard
Roy Stannard
Kay Stannard
Ross Margetts
Rosie Cavedaschi
Ros February
Rosemary Cogdon
Rosemary Cave
Rosemarie Jerome
Rosemary Benwell
Rory Church
Ronnie Armstrong
Rohan Patel

Shayne Fensom
G V Sharp

Roberta Page
Robert Bruins
Robert Bird
Robin Vallins
Yvonne Vallins
Rob Pullinger
Thomas Pullinger
Vicky Pullinger
Robert Paliotta
Rik February
Richard Thorburn
Richard Symonds
Richard W. Symonds
Richard Nixon
Rhys Whittle
Rhonda Dann
Sophie Warren
Benson Kalubi
Rhoda James
Rachel Hillman
Reuben Peters
Aurora Lula
Remo Lula
Aaron Squirrel
Maretta Rees
Reece Church
Mr Reece Tate
Kelly Byworth
Stephen Leake

Mrs Burgess
Natalie Sullivan

Rudi Bird
Christopher Vincent Gartlan
Katerina Radova
Radhika
Rachel Price
Rachel Pamment
Mr P Wakeham
Mrs I Wakeham
Lisa Wilson
Claire Burrage
Paul Thomas
Samantha Thomas
Jenny Willis
Paul White
Adelaide Jenkins
Kerry Dawson
Cristian Pierri
Karen Lewis
Tyler Pierri
Philippa Mitchell
Rex Upham-Hill
Petty West
Graham Petschel
Peter Willis
Peter Brooks
Peter Jordan
Peter Beckley
Pete Lyons
Peter Griffiths

Rod Horton
Robert Rolfe
Robert MacPherson
George Penfold
Mr. & Mrs. G. Harwood
Jean Goodrich
Joanne Brown
Peter Burrows
Mary Burrows
Emily Johnson
Paul Oliver
Paul Brown
Pauline February
Paul Hughes
Paul Davis
Paul Berry
Paul Miller
Paula Hanslow
Paul Roberts
Paul Harrison
Patricia Patel
V Patel
Mrs P Godwin
Alexander Curtis
Pat Crees
Simon Pashley
Nick Pashley
Mr P Akhtar
Parmjit Sidhu
Peter Parker
Pam James
Sarah Page

Rebecca Betteridge
Rebecca Holt
Mr Burgess
Nick Price
Christopher Wilkinson
Mandy Wilkinson
Nick Wilkinson
Rachael Wilkinson
Shaun Wilkinson
Neena Seeruthun
Andrew Towner
Martin Bates
Mrs Kim Nobbs
Nadine Terry
Anita Bateman
Niraj Patel
Nicki Rice
Nick Cornwell
Nick Edwards
Nicole Sullivan
Niall Kelly
Niall Nugent
Johnny Da Silva
Netta Bond
Vanessa Marriott
Neil Slugocki
Neil Donald
Natalie Bingham
Julie Roberts
Neil Smith
Natalie Saunders-Neate
Mr Nathan Spriggs

Natalie Sullivan
Naomi Wiggins
Nancy Weltner
Najiya Slimani
M. Lashmar
Mr Michael Whiting
Maeve Weller
Laura Randall
Moustapha Kada
Mrs Janette Thompson
Linda Keynes
Wayne Bonner
Kara Bonner
Amanda Madel
Harry Madel
Trevor Madel
Samantha Wood
Mrs Sue Bristow
Margaret San Juan Martin
Shani Wheatley
Molly Rumble
Morag Warrack
Mohsin Ahmed
Mr M Richardson
Mr Martin Saunders
Jonathan Mitchell
Paul Lewis
Michael Petryszn
Mike Parker

Mrs Kathleen Cambridge
Julie Daly
Patricia Burrett
Mike Doyle
Maria Lula-Harris
Michael Schultz
Michelle Collins
Michele Singleton
Mike Jones
Pat Eldridge
Michelle Taylor
Melissa Gomes
Mel Ansell
Marion Auffret
Cheryl Higgins
Joanna Dyckes
W.M. Deacon
Michael Clive Latin
Deborah Burbidge
Mrs Maxine Soper
Maurice Frost
Nathan Frost
Maureen Foster
Matt Leese
Matthew King
Matthew Jones
Matthew Butler
Matt Calver
Matthew Allen
Matthew White
Matt Coleman
Stacey Barker

Natalie Chambers
Natalie Zevka
Mrs Natalie Moran
Martin Huxter
Greg Upcott
Kinsley Upcott
Lola Upcott
Martine Channell
Martin Harbor
Mr A Marriott
Mrs K Marriott
Mark Hynes
Mark Lawford
Mark Brown
Mark Amos
Mr M Nieman
Mark Butcher
Marilyn Stockbridge
Mary Scott
Victoria Arnold
Sarah Seager
Mr Williams
Amanda Mustafaj
Mark McKown
Malcolm Woodhead
Malcolm Millard
Mala Patel
Maja Jasko
Margaret Florey
Mohammad Badshah
Lynsey Woods
Lynn Lowe

Michael Eaton
Michael Simmonds

Luke Grima
Lucy Downie
Lucy Vella
Linda Taylor
Logan Peers
Lauren Parisi
Louise Waugh
Louise Weekes
Louise Brooks
L Haynes
Lisa Burton
Charlotte Cox
Lauren O'Sullivan
Lorraine Pateman
Lorraine Graham
Susan Johnson
David Thrift
Lois Thrift
Mr Lee Whiting
Mr D Hill
Gordon Mitchell
Carina Higson
Jackie Littleton
Lisa Tomkinson
Lisa Powell
Kara-Leigh April Harrison
Lisa Curcher
Lisa Brown
Joan Hoys

Stuart Mason
Mary Gasson
Martyn Moore
Shirley Bettinson
Lisa Bettinson
Linda Dabboussi
Mrs L Burchett-Vass
Lillian Kirby
Master Liam Spriggs
Alida Edgar
Lewis Holman
Lesley King
Lesley Jacobs
Susan Bevis
Miles Carroll
Julia Hayes
Len Hayes
Lee Sellers
Lee Kabza
Rhys Carney
Jimi Carney
Lee Carney
Leanne Sim
Kyle Sim
Olivia Lindsey
Lewi Lindsey
Leeanne Jones
Mrs Stevens
Lauren Judge
Laura Virgo
Laura Fraser
Laura Irvine

Mrs Lynda Morgan
Lee Warner

Ms Charlotte Latimer
Alena Hobson
Donna Botting
Jayden van de Lagemaat-Bettinson
Andre van de Lagemaat
P Wheeler
Kyle Fish
Jakub Jasko
Kate Towner
Karen & Phil Smith
Phil Smith
Kim Piercey
Peet Boxall
Kate Nulty
Molly Marsh
Alastair Ross
Bradley Ross
Karen Marsh
Joyce McGinty
Kevin McGinty
Karla Thompson
Kathryn Pashley
Krystal-Ann Peters
Harish Purshottam
Kirsty Piper
Kirsty Browning
Kim West
Kim Fairman
Kerry Hughes

Emma Challis
Ian Johnson

Kevin McGrath
Kerry Powell
Kerry Longmate
Kerry Pearson
Kerry Mudway
Kerry Allen
Lerrie Atkinson
Kenneth Webster
Pamela Webster
Kelly Channell
Kerry McBride
Karen Litten
K Christensen-Webb
Kim Elliott
Elizabeth Gardner
Kayleigh Nash
Kayleigh Gillham
Kaye Handman
Kaya-May
Alfie Turner
Ben Turner
Charlie Turner
Katie Turner
Josh Turner
Katie Lampey
Katherine Randall
Katie Peers
Barbara Deakin
Karen Hackwell

Laura Marden
Laura Hamilton

Karen Randall
Karen Lambert
Karen Burling
Karen Beckett
Kara Bonner
Katharine Thompson
Kelly Virgo
Ashad Khan
Janet Gilroy
Julie Brennan
Julie Denman
Barbara Frost
Julia Frost
Julia Lee
Jigar Solanki
Shanaya Solanki
Nick Young
Jo Murray
Jacky Curtis
Josephine Anne Young
Josh Clarke
Josh Lambert
Josh Collins
Jose Manuel Pereira Sousa
Jocelyne Berreen
Jordan Fawcett
Josephine Evans
Peter Evans
Jo Bender

Mrs Linda Kelly
Kevin Grimshaw

John Collisson
Sue Collisson
Nathan Johnston
John Mortimer
Pat Mortimer
John Connelly
John Tite
June Tite
John Mills
John Cooban
Joseph James
Joe Dines
Joe Comper
Joe Doyle
Jody Channell
Jodi Sanderson
Russell Dentith
Wesley Sanderson
Joanne Minihane
Sophie Coward
Billy Coward
Jacob Coward
Jo Coward
Jenny Deacon
Emily Tobin
James MacLean
Jilly Thomspens
Jill Dunster
Jennie Walters

Karen Pitt
Karen Eales

Jenny Lockyer
Jenny Yaglikci
Jean MacLean
John Winter
John Dempsey
John Browning
Jay Whittle
Jay Carson
Jason Miles
Sian Richards
Mrs J Sully
Janna Smith
Janice Judge
Garry Bonner
Jan Bonner
Janet Large
Kieront Hollamby
Janet Lee
Janet Boniface
Janet Armstrong
Jane Schultz
Jane Grimshaw
Jane Edwards
Jane Carter
Jane Binmore
Jan Constable
Jamie Lewis
James Woodhead
James Wallace

John Thompson-Balk
Jake Saul
Jaedon Mulligan
Jaedon Mulligan
Jacqui Amos
Jacqueline Cogdon
Jacquie Ballard
Mrs. J. Jenkins
Jack Veaney
Jo Parrock
John Baker
Paul Wilsdon
Claire Howard
Michelle Howe
Isaac Allen
Iryna Yuille
Peter Cole
Iqra Ahmed
Dexter Robinson
Kevin Stephenson
Koji Stephenson
Mayumi Stephenson
Miyuki Stephenson
Steve Coward
Chris Manning
Imogen Baldock
Katie Nichols
Ines Manning
Kay Ambrose
Ian White
Ian Madel
Ian Harris

Jennie Parkes
Mrs Jennifer Sweeney
Jennifer Hord
Katie Hull
Hazel Santaniello
Howard Sanders
Clare Haworth
Roy Hood
Sheila Hood
Sean Dowling
Clare Dowling
Maureen Dowling
John Dowling
Delia Hodder
Hayley Skerry
Hinal Limbachia
Kerry Haines
Helen Burton
Mr. Tamas Hegedus
Heather Bonner
Heather Peters
Linda Healy
Hayley Allen
Charlotte Hassan
Sarah Hares
Daniel Patrick Cambel
Michaela Hanusová
Hannah Brown
Haley Kelly
Thomas Spindler
Helen Spindler
Gwyn Colbourn

James Senra

Nicola Faulkner
Gemma Neathey
Tess Weisner
Jacqueline Russo
Joanne Brooks
Georgina Atkins
Gill Courtnell
Gillian Kellam
Mrs G Lawrence-Maxey
Ms E Lawrence-Maxey
Ms M Lawrence-Maxey
Gillian Field
Daniel Jenkins
Georgina Woodhead
Georgina Rice
Georgina Hillen
George Hockley
Steve White
Geof Mulligan
Geoff Robinson
Gemma Friend
Gemma Williams
Gemma Legrand
Gemma Kearsey
Geoff Bellamy
Garry Blunt
Gary Brazier
Gary Broadbridge

Gareth Gates
Jennifer Frost
David Roskilly

Sue Wells
Samantha Willmor
Fumiyo Tansley
Christopher Wright
Lisa King
Funmi Aji
Nathan Hanson
Fernando Engelbrecht
Phil Barnett
Faye Bargery
Fatima Moseley
Falak Badshah
Fahmi Maxwell
Kay Lewis
Ethan Peers
Eric Crawford
Steve Wright
Emma Challis
Emma Maxwell
Emma Jones
Sanda Andrew
Denis Andrew
Emma Andrew
Erin Andrew
Ewan Andrew
Anthony Ellis
Ellie Marsh
Edward Lewis

Greig van Outen
Kevin Greenfield
Graham Johnson

Gillian Billing
James Billing
Jessica Billing
Eileen Maughan
Estelle Gaines
Ian Holman
Dwayne Stuart
Alan Dunt
David Thornback
Daniel Britton
Daniela Scialo-Page
Gladys Betton
Leslie Betton
Debbie Betton
Clive Turner
Donna Pickin
Dr Richard Phillips
Ben Mark
Dave Kernohan
Patricia Kernohan
Sandra Kernohan
Declan McGinty
David L Andreson
Darren Saunders
Dionne Wilson
Diane Cooper
Ray Cooper
Diane Penfold

Debbie Staples
De Malone
Derek Wall
Derel Meakings
Deion Newman
Debbie Guttridge
Debbie Street
Debbie Piller
Debbie Saunders
Mr Dean Whiting
Dean Hollamby
D C & J I Stephenson
Donald C Stephenson
Joyce I Stephenson
Irene V Abbott
Darren Browning
Dawn Wilkinson
Brian Keegan
Eleanor Keegan
Dawn Keegan
David Probett
David Margetts
David Ashton
David Spindler
David Newcombe
David Covill
Dave Taylor
Dave Neathey

Elaine Dancaster
Dave Carter
Daria Czekajska
Daniel Jones
Danielle Bunn
Dan Gardener
Daniel Furlong
Jennifer Cheeseman
Damian Tommy
Donna Ray
David Cox
Mrs Carole Whiting
Chris Smith
Chris Simmons
Colin Webster
Tina Webster
Thomas Barlow
Michael Cook
Graham Harding
Michael McKnight
Linda Connelly
Collette Davies
Mr Colin Spriggs
Chris Morris
Pieter Classens
Sam Clark
Ashley Clark
Clare Clarke-Jones
Clare Bowler
John Gunner
Claire Robinson.
Chris Kennedy

Diana Brown
D Wilbourn
W. Witsen Elias
Kieran Faulkner
Chris Bower
Charlie Diamond
Chris Cook
Christine Christensen
Chris Spurgeon
Chris Shelford
Chris Hathaway
Cheryl Jones
Cheryl Brown
Jane Chart
Mr S Chart
Charlotte Verbeeten
Charlie Field
Donna Hughes
Charis Edwards
Chantelle Bateman
Greg Tyler
Chris Oxlade
Colin Field
Ross Pennycook
Chrissie Cook
Chrissie Cook
Carol Easley
Cassie Barry
Hollie McCarthy
Carmen Cespedes Sanchez
Carl Rickwood
Paul Capper

David Christensen

Chris Maidment
Carina Anane-Dumfeh
Kristen Bailey
Ian Burke
Martin Hayward
Gill Collins
Barbara Thornback
Bryan Pashley
Brian Fagence-Traynor
Bruce Trewin
Brian Webb
Brian James
Brian Dickinson
Brian Smith
Brian Eastman
Brenda Burgess
Brenda Holman
Bradley Flory
Will Bower
Leigh Holman
Mehboob Sidat
Barbara McMahan
Brett Lincoln
Jason Jeffers
Charlotte Grimshaw
Robin Malcolm
Bhavesh Lakhani
Beckie Hayward
Rebecca Willis

Ciaran Barron
Mrs Beverley Bain
Beth Roskilly
Janine Robins
Benjamin Webster
Samuel Webster
Ben Turner
Ben Golding
Ben Coleman
Stephen Pomroy
Rebecca Zammit
Rebecca Allen
Bea Chambers-Whyte
William Dunning
Barry Edwards
Becky Bates
Ellis Barton
Gillian Barton
Peter Barton
Toby Barton
Barry Taylor
Jan Harding
Barry Preston
Jennifer Preston
Barbara Alice Heather Vivian
Barbara Pattison
Mrs B Coleman
Barbara Dunning
Cara Bannister
Finn Bannister
Fiona Bannister
Shaun Bannister

Carrie Anne Campbell
Chris Smyth
Chris Jones
David Baker
Steven Vine
Holly MacDonald
Azra Meral
Mrs Donna Ayres
Alan Wells
Jean Austin
Anne Heuser
Audrey McLoughlin
Audrey Lindo
Ashleigh Miller
Armin Hartinger
Anita Rice
Georgia Thomas
Jessica Thomas
Louis Thomas
Danny Swain
Olivia Meadows
Charlie Meadows
S Meadows
Finley Meadows
Anisah Sidat
Tony Sillince
Ann Richardson
Ann Harrington
Anne Tullett
Annette Gidman
Anne Greenbrook
Anne Fairbank

Beverly Clayden

Angela Cohen
Angela Darbon
Andy Tolfrey
Billy Tolfrey
Andrew Summers
Andrew Jagger
Jensen Jagger
Madelaine Jagger
Carlene Ahangama
Linda Ahangama
Mrs B Brown
Andrew Judge
Andrew Cusack
Andrew Chan
Lily Chan
Andrew Skudder
Mrs Andrea Richardson
Andrea Roberts
Ananda and Pieter
Ammaarah Sidat
Amy Young
Amanda Stannard
Mrs A Austin-Way
Amanda Roskilly
Amanda Jagger
Amanda Parker-Small
Joe Lavery
Edward Page
A Page

Paul Ballard
Lin Ballard
Allan Lambert
Georgina Allan
Gina Allan
Alan Burgess
Alison Warner
Alicia Haworth
Alicia Cusick
Alison Burke
Mrs Alison Hollman
Alfie Jones
Alexander Thrift
Alex Harris
Alex Petryszyn
Alison Heine
Perry Doherty

Aisha Sidat
Ania Jasko
Angie Gasson

Miss Allanna Dwyer

PART 2

Representations Summary

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/001	Airport Industrial Property	Mr Geoff Bullock	Local Plan Map			GAT4	N	Y	Y	Y
			Local Plan	Chapter 5:Economic Growth		EC2	N	Y	N	Y
REP/002	Aggregate Industries	Ms Kate Matthews	Local Plan Map				Y	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV11	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Growth		EC4	Y	Y	N	Y
			Local Plan	Chapter 6: Housing		H2	Y	Y	N	Y
REP/003	Mr James Mclean (Aberdeen Investments)	Mr Jonathan Leadbetter	Local Plan Map				Y	Y	N	Y
			Local Plan	Chapter 6: Housing		H1	Y	Y	N	Y
			Local Plan	Chapter 6: Housing		H2	Y	Y	N	Y
			Local Plan	Chapter 6: Housing		H3	Y	Y	N	Y
			Local Plan	Chapter 6: Housing		H4	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH3	Y	Y	N	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 4: Character		CH4	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH5	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Growth		EC1	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Growth		EC2	Y	Y	N	Y
			Local Plan	Chapter 8: Infrastructure		IN1	Y	Y	N	Y
REP/004	Mr Alan Quirk		Local Plan	Chapter 6: Housing	6.68-6.73	H5	N	Y	N	Y
REP/005	Mr Richard Bucknall	Mr Tony Fullwood Associates	Local Plan	Chapter 6: Housing		H2	Y	Y	N	N
			Local Plan	Chapter 7: Environment		ENV2	Y			
			Local Plan	Chapter 7: Environment		ENV4	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH7	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH17	Y	Y	N	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/006	Mr Julian Goodban (Bellway Homes Ltd)	Ms Victoria Bullock (Barton Willmore)	Local Plan		6.34-6.41	H1	N	N	N	N
			DTC				N	N	N	N
REP/007	Mr John Byng		Local Plan	Chapter 7: Environment		ENV1	Y	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV11	Y	Y	N	Y
			Local Plan	Chapter 4: Character	4.45	CH9	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Development		EC1	Y	Y	N	Y
REP/008	Mr Graham Berry		Local Plan	Chapter 2: Crawey 2030		Spatial Context	NC ¹			
			Local Plan	Chapter 8: Infrastructure		IN1	NC			
REP/009	Mr Kevin Berry		Local Plan	Chapter 6: Housing	6.69- 6.73	H5	Y	N	N	N
REP/010	Mrs Jillian Katherine Bell		Local Plan	Chapter 7: Environment		ENV3	N	Y	Y	Y
REP/011	Mrs Natalie Bingham		Local Plan	Chapter 6: Housing		H5	Y	N	N	N

¹ NC = No Comment

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/012	Bupa Care Services	Mr Andy Stallan (Alliance Planning)	DTC				NC	N	N	N
			Local Plan	Chapter 6: Housing		H1	NC	N	N	N
			Local Plan	Chapter 6: Housing	Oakhurst Grange	H2	NC	N	N	N
			Local Plan	Chapter 6: Housing		H4	NC	N	N	N
			Local Plan	Chapter 2: Crawley 2030		Spatial Context	NC	N	N	N
REP/013	Crest Strategic Projects	Mr Charles Collins (Savills)	DTC				NC	N	N	N
			Local Plan	Chapter 6: Housing		H1	NC	N	N	N
			Local Plan	Chapter 6: Housing		H2	NC	N	N	N
			Local Plan	Chapter 1: Introduction		Key Diagram	NC	N	N	N
			Local Plan	Chapter 2: Crawley 2030		Spatial Context	NC	N	N	N
			Local Plan	Chapter 5: Economic Development		EC1	NC	N	N	N
REP/014	Mr Chris Maidment (Crawley's Local Economy Action Group)	Miss Lise Sorensen (CBC)	Local Plan	Chapter 5: Economic Development		EC1-EC9	N	Y	Y	Y
REP/015	CEMEX UK Operations Ltd	Ms Kate Matthews	Local Plan Map				Y	Y	N	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate	
			Local Plan	Chapter 5: Economic Development		EC4	Y	Y	N	Y	
			Local Plan	Chapter 7: Environment		ENV11	Y	Y	N	Y	
			Local Plan	Chapter 6: Housing		H2	Y	Y	N	Y	
REP/016	Mrs Samantha Clark (Canadian & Portland Estates plc)	Mr Jeff Thomas (jmt Planning)	Local Plan	Chapter 5: Economic Development		EC3	Y	Y	N	Y	
REP/017	Crawley CCG (Dr Amit Bhargava)		Local Plan	Chapter 8: Infrastructure		IN1	NC				
REP/018	Costco Wholesale UK	Mrs Karen Calkin (RPS Planning and Development Ltd)	Local Plan	Chapter 5: Economic Development		EC1	N	Y	N	Y	
REP/019	Mr Charles Crane		Local Plan	Chapter 6: Housing		H2	Y	Y	N	Y	
REP/020	Mr David Christensen		Local Plan	Chapter 7: Environment		ENV3	N	Y	Y	Y	
REP/021	Mr John Cooban		Sustainability Appraisal					N	Y	N	N
REP/022	Day Group Ltd	Ms Kate Matthews	Local Plan Map				Y	Y	N	Y	

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			Local Plan	Chapter 7: Environment		ENV11	Y	Y	N	Y
			Local Plan	Chapter 6: Housing		H2	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Development		EC4	Y	Y	N	Y
REP/023	Environment Agency (Ms Jennifer Wilson)		Local Plan	Chapter 7: Environment		ENV1	N	Y	Y	Y
			Local Plan	Chapter 7: Environment		ENV2	N	Y	Y	Y
			Local Plan	Chapter 7: Environment		ENV6	N	Y	Y	Y
			Local Plan	Chapter 7: Environment		ENV8	N	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV10	N	Y	Y	Y
			Local Plan	Chapter 8: Infrastructure		IN7	N	Y	N	Y
			Local Plan	Chapter 2: Crawley 2030		Spatial Context	N	Y	Y	Y
REP/024	Mr Brian Eastman		Local Plan	Chapter 7: Environment		ENV3	N	Y		Y
REP/025	Mrs Jenny Frost (IVCAAC)		Local Plan	Chapter 2: Crawley 2030		Spatial Context	Y	Y	N	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 7: Environment		All and ENV3	Y	Y	Y	Y
			Local Plan	Chapter 4: Character		CH6-CH16	Y	Y	Y	Y
			Local Plan	Chapter 9: Gatwick		GAT1	Y	Y	N	Y
REP/026	Mr Richard A Flint		Local Plan	Chapter 6: Housing		H5	N	Y	Y	Y
REP/027	Gatwick Airport (Rita Burns)		Local Plan	Chapter 2: Crawley 2030		Spatial Context	Y	Y	N	Y
			Local Plan	Chapter 3: Sustainable Development		SD1	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH2	Y	Y	Y	Y
			Local Plan	Chapter 5: Economic Development		EC1	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Development		EC2	Y			
			Local Plan	Chapter 6: Housing		H2	Y	Y	N	Y
			Local Plan	Chapter 6: Housing	Housing General, Site Allocations (Forge Wood), Noise and Safeguarded Land (6.21)	H2	Y	Y	N	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 6: Housing		H5	Y	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV11	Y	Y	N	Y
			Local Plan	Chapter 9: Gatwick		GAT1	Y	Y	Y	Y
			Local Plan	Chapter 9: Gatwick		GAT2	Y	Y	N	Y
			Local Plan	Chapter 9: Gatwick		GAT3	Y	Y	Y	Y
			Local Plan	Chapter 9: Gatwick		GAT4	Y	Y	Y	Y
			Local Plan	Chapter 8: Gatwick		IN1	Y	Y	N	Y
			Local Plan	Chapter 8: Gatwick		IN3	Y	Y	Y	Y
			Local Plan	Chapter 8: Gatwick		IN6	Y	Y	N	Y
			Local Plan			Noise Annex	Y	Y	N	Y
REP/028	Mr Craig Barnes (Gladman Developments)		Local Plan	Chapter 6: Housing		H1	Y	N	N	N
REP/029	Highways Agency (Mr Nigel Walkden)		Sustainability Appraisal		Objective 7 and 8 p.6		NC			
			Sustainability Appraisal		Paragraph 5.11		NC			

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Transport Evidence Base				NC	Y	N	Y
			Infrastructure Plan				NC	Y	N	Y
	Local Plan		Chapter 1: Introduction			Crawley 2030: A Vision Spatial Context	NC	Y	Y	Y
	Local Plan		Chapter 2: Crawley 2030		2.30-2.31	SD1	NC	Y	Y	Y
	Local Plan		Chapter 3: Sustainable Development			SD1	NC	Y	N	Y
	Local Plan		Chapter 4: Character			CH3	NC	Y	N	Y
	Local Plan		Chapter 4: Character			CH9	NC	Y	N	Y
	Local Plan		Chapter 5: Economic Development			EC1	NC	Y	N	Y
	Local Plan		Chapter 5: Economic Development			EC6	NC	Y	Y	Y
	Local Plan		Chapter 6: Housing		6.11-6.13	H1	NC	Y	N	Y
	Local Plan		Chapter 8: Infrastructure			IN1	NC	Y	Y	Y
	Local Plan		Chapter 8: Infrastructure			IN3	NC	Y	Y	Y
	Local Plan		Chapter 8: Infrastructure			IN5	NC	Y	Y	Y
	Local Plan		Chapter 9: Gatwick			GAT3	NC	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/030	Mr C. Heymann	Mr Rob O'Carroll (DPDS Consulting)	Local Plan	Chapter 6: Housing		H1	N	Y	N	Y
REP/031	Home Builders Federation (Mr James Stevens)		DTC					N	N	N
			Local Plan	Chapter 6: Housing		H1	Y	N	N	N
			Local Plan	Chapter 6: Housing		H4	Y	N	N	N
			Local Plan	Chapter 7: Environment		ENV6	Y	N	N	N
			Local Plan	Chapter 7: Environment		ENV7	Y		N	
			Local Plan	Chapter 7: Environment		ENV9	Y		N	
			Local Plan	Chapter 8: Infrastructure		IN4	Y		N	
			Local Plan	Chapter 8: Infrastructure		IN5	Y		N	
			Local Plan	Chapter 8: Infrastructure		IN6	Y		N	
							Y			
REP/032	High Weald AONB Unit (Mr Andrew Shaw)		Local Plan	Chapter 4: Character	S of Broadfield	CH9	Y	Y	Y	Y
			Local Plan	Chapter 4: Character		CH10	Y	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 6: Housing		H5	Y	Y	Y	Y
REP/033	Horsham District Council		DTC					Y	Y	Y
			Local Plan	Chapter 6: Housing		H1	NC			
			Local Plan	Chapter 7: Environment		ENV7 + ENV9	NC			
			Local Plan	Chapter 5: Economic Growth		EC1	NC			
			Local Plan	Chapter 5: Economic Growth		EC5	NC			
			Local Plan	Chapter 8: Infrastructure		IN1	NC			
			Local Plan	Chapter 9: Gatwick		GAT1	NC			
REP/034	Mr Martin Hayward		Local Plan	Chapter 7: Environment		ENV3	N	Y	Y	Y
REP/035	Mr Peter Jordan		Local Plan	Chapter 4: Environment		CH2	N	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV3	N	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 2: Crawley 2030		Spatial Context	N	Y	N	Y
			Local Plan	Chapter 9: Gatwick		GAT2	N	Y	N	Y
REP/036	Dr Bill Temple-Pediani (KTI Energy Ltd)		Local Plan	Chapter 7: Environment		ENV7	Y	N	N	N
REP/037	Lynton Developments (Mr Bill Sanders)	Mr Keith Webster (Ancer Spa Ltd)	Local Plan		5.21	EC1	N	Y	Y	Y
REP/038	Lynton Developments (Mr Bill Sanders)	Mr Keith Webster (Ancer Spa Ltd)	Local Plan Map			CH9	N	Y	N	Y
REP/039	Mid Sussex District Council		Duty to Cooperate				N	Y	Y	Y
REP/040	Mr Iain Millar (Tinsley Lane Residents Association)		Local Plan	Chapter 6: Housing	Housing p74	H2	Y		N	
REP/041	Mr Colin Maughan		Local Plan	Chapter 2: Crawley 2030		Spatial Context	Y	Y	Y	Y
REP/042	Mole Valley District Council (Mr Jack Straw)		Local Plan	Chapter 6: Housing	6.40-6.41	H1	N	Y	Y	Y
			Local Plan	Chapter 6: Housing		H5	N	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
				Chapter 4: Character		CH8	N	Y	Y	Y
			Local Plan	Chapter 5: Economic Development	5.12-5.15	EC1	N	Y	Y	Y
			Local Plan	Chapter 9: Gatwick	9.6,9.13 and 9.18	GAT1	N	Y	Y	Y
			Duty to Cooperate				N	Y	Y	Y
REP/043	Mr Derek Meakings		Local Plan	Chapter 9: Gatwick		GAT1	N	N	N	N
			Local Plan	Chapter 5: Economic Development		EC1	N	N	N	N
REP/044	Miss Kim McGregor (Moat Housing)		Local Plan	Chapter 6: Housing		EC6	N	Y	Y	Y
REP/045	Mr Ross McNulty	Mr Nick Diment (GL Hearn Ltd)	Local Plan	Chapter 5: Economic Development		EC2	Y	Y	N	Y
REP/046	Mr Steve Sawyer (MRBD Ltd)		Local Plan	Chapter 5: Economic Development		EC1	N	Y	Y	Y
			Local Plan	Chapter 5: Economic Development		EC3	N	Y	Y	Y
			Local Plan	Chapter 5: Economic Development		EC4	N	Y	Y	Y
			Local Plan Map			EC3	N	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/047	Mayfield Market Towns	Miss Kate Kerrigan (Tetlow King)	Duty to Cooperate				Y	N	N	N
			Sustainability Appraisal				Y	N	N	N
			Local Plan	Chapter 6: Housing		H1	Y	N	N	N
			Local Plan	Chapter 5: Economic Development		EC1	Y	N	N	N
			Local Plan	Chapter 5: Economic Development	All	Section 5	Y	N	N	N
			Local Plan	Chapter 6: Housing	All	Section 6	Y	N	N	N
REP/048	Natural England (Mr John Lister)		Local Plan	Chapter 4: Character		CH3	NC	Y	Y	Y
			Local Plan	Chapter 6: Housing		H5	NC	Y	Y	Y
REP/049	Network Rail (Mr James Walton)		Local Plan	Chapter 6: Housing		H1	NC			
			Local Plan	Chapter 6: Housing		H2	NC			

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 8: Infrastructure		IN3	NC			
			Local Plan	Chapter 5: Economic Growth		EC1	NC			
			Local Plan	Chapter 8: Infrastructure		IN6	NC			
			Local Plan	Chapter 4: Character	4.38	CH8	NC			
			Local Plan	Chapter 4: Character	4.11		NC			
				Chapter 8: Infrastructure		IN3	NC	Y	Y	Y
			Local Plan	Chapter 8: Infrastructure	8.29	IN6	NC	Y	Y	Y
			Local Plan	Chapter 2: Crawley 2030		Spatial Context	NC			
REP/050	Persimmon Homes and Taylor Wimpey	Mr James Millard (Pegasus Planning)	Duty to Cooperate				Y			
			Local Plan	Chapter 4: Character		CH5	Y			
			Local Plan	Chapter 6: Housing		H1	Y			
			Local Plan	Chapter 6: Housing		H2	Y			
			Local Plan	Chapter 6: Housing		H3	Y			
			Local Plan	Chapter 6: Housing		H4	Y			

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 7: Environment		ENV6	Y			
			Local Plan	Chapter 7: Environment		ENV7	Y			
			Local Plan	Chapter 7: Environment		ENV9	Y			
			Local Plan Map				N	Y	N	Y
REP/051	Mr David Payne (Mineral Products Association)		Local Plan	Chapter 6: Housing		H2	N	Y	N	Y
			Local Plan	Chapter 5: Economic Development		EC4	N	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV11	N	Y	N	Y
			Local Plan	Chapter 7: Environment		EC3	N	Y	N	Y
REP/052	Mr Nicholas Price		Local Plan	All		NC	Y	Y	Y	Y
REP/053	RSPB South East		Local Plan	Chapter 7: Environment		ENV2	N	Y	N	Y
			Local Plan Map			ENV2	N	Y	N	Y
REP/054	Reigate and Banstead Borough Council (Ms Cath Rose)		Duty to Cooperate				N	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 6: Housing		H1	N	Y	Y	Y
			Local Plan	Chapter 6: Housing		H5	N	Y	Y	Y
			Local Plan	Chapter 6: Housing		EC1	N	Y	Y	Y
			Local Plan	Chapter 6: Housing		EC5	N	Y	N	Y
			Local Plan	Chapter 6: Housing		EC6	N	Y	N	Y
REP/055	T&L Crawley LLP	Miss Wakako Hirose (Rapleys)	Local Plan Map				Y	Y	N	y
			Local Plan	Chapter 1: Crawley's Local Plan		Key Diagram	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH3	Y	Y	N	Y
			Local Plan	Chapter 4: Character		CH6	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Development	5.41	EC3	Y	Y	N	Y
			Local Plan	Chapter 5: Economic Development	5.60 & 5.62	EC7	Y	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV6	Y	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV7	Y	Y	N	Y
			Local Plan	Chapter 8: Infrastructure		IN1	Y	Y	N	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/056	Miss Louise Richardson		Local Plan	Chapter 7: Environment		ENV2	N	Y	Y	Y
			Local Plan Map				N	Y	Y	Y
REP/057	Sport England (Heidi Clarke)		Local Plan	Chapter 7: Environment		ENV4	NC	Y	Y	Y
				Chapter 6: Housing		H2	NC	Y	Y	Y
REP/058	Southern Water (Sarah Harrison)		Local Plan	Chapter 6: Housing		H2	N	Y	N	Y
REP/059	Mr Richard Symonds		Local Plan	Chapter 7: Environment		ENV3	Y	Y	Y	Y
				Chapter 4: Character		CH9	Y	Y	Y	Y
REP/060	Mr Laurence Skinner		Local Plan	Chapter 5: Economic Development	5.38	EC3	N	Y	Y	Y
				Chapter 5: Economic Development	5.52	EC5	N	Y	Y	Y
				Chapter 7: Environment	7.69	ENV9	N	Y	Y	
				Chapter 7: Environment	7.34	ENV5	N	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
				Chapter 4: Environment	4.21	CH3	N	Y	Y	Y
				Chapter 4: Environment	4.37	CH7	N			
				Chapter 8: Environment	8.11	IN2	N	Y	Y	Y
REP/061	Surrey County Council (Katharine Harrison)		Local Plan	Chapter 8: Infrastructure	Transport Assessment for Key Development Sites and Employment Opportunity Areas	IN3	NC	Y	N	Y
REP/062	Sussex Police (Samantha Prior)		Duty to Cooperate				NC			
			Local Plan	Chapter 1: Crawley's Local Plan		Crawley 2030: A Vision	NC			
			Local Plan	Chapter 6: Housing		H1	NC			
			Local Plan	Chapter 8: Infrastructure		IN1	NC			
REP/063	Sogno Family	Mr Chris Rees (Savills)	Local Plan	Chapter 6: Housing		H2	Y	Y	N	

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/064	Mr Peter Temple-Smithson		Local Plan	Chapter 7: Environment		ENV3	N	Y	Y	Y
REP/065	Mrs Anne Scutt		Local Plan	Chapter 7: Environment		ENV3	N	Y	Y	Y
REP/066	Thames Water (Mr Mark Mathews)	Mr David Wilson (Savills)	Local Plan	Chapter 8: Infrastructure		IN1	N	Y	N	Y
			Local Plan	Chapter 7: Environment		ENV8	N	Y	N	Y
			Local Plan	Chapter 4: Character		CH6	N	Y	N	Y
			Local Plan	Chapter 5: Economic Development		EC5	N	Y	N	Y
			Local Plan	Chapter 6: Housing		H1 and H2	N	Y	Y	Y
REP/067	Travis Perkins Ltd	Mr Jonathan Best (Blue Sky Planning Ltd)	Local Plan	Chapter 5: Economic Development		EC3	Y	Y	N	Y
REP/068	Mr William Geraint Thomas		Local Plan	Chapter 7: Environment	7.21, 7.22 and 7.23	ENV3	Y	Y	Y	Y
REP/069	Mr Ross Anthony (The Theatres Trust)		Local Plan	Chapter 8: Infrastructure	8.7	IN1	N	Y	Y	Y

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
REP/070	Universities Superannuation Scheme	Ms Julia Chowings (Deloitte)	Local Plan	Chapter 5: Economic Development		EC2	N	Y	N	Y
			Local Plan Map				N	Y	N	Y
REP/071	Mr Gary Scott (Windsor Developments Ltd)	Mr Jeff Thomas (jmt Planning)	Local Plan	Chapter 5: Economic Development	Economic Strategy (p.47)	EC1	Y	Y	N	Y
					5.5	EC1	Y	Y	Y	Y
					5.10-5.13	EC1	Y	Y	Y	Y
					5.14	EC1	Y	Y	N	Y
					5.20.	EC1	Y	Y	N	Y
					5.21	EC1	Y	Y	N	Y
REP/072	The Wilky Group	Mr Simon Fife (Savills)	Local Plan Map				Y	Y	N	Y
				Chapter 1: Crawley's Local Plan	Key Diagram	Y	Y	N	Y	
				Chapter 5: Economic Development	EC1	Y	Y	N	Y	
				Chapter 7: Environment	ENV2	Y	Y	N	Y	

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
				Chapter 9: Gatwick		GAT2	Y	Y	N	Y
REP/073	Waverley Borough Council (Mr Matthew Ellis)			Chapter 6: Housing	Unmet Housing Needs	H1	NC	Y	N	Y
REP/074	West of Ifield Consortium	Charlotte Yarker (Montagu Evans LLP)	Duty to Cooperate				NC	N	N	N
			Local Plan	Chapter 6: Housing		H1	NC	N	N	N
			Local Plan	Chapter 6: Housing		H2	NC	N	N	N
REP/075	WSCC (Mr Chris Owen)		Local Plan Map							
			Transport Evidence Base				NC			
				Chapter 2: Crawley 2030		Spatial Context	NC			
				Chapter 4: Character		CH12	NC			
				Chapter 6: Housing		H2	NC			
				Chapter 6: Housing		H5	NC	Y	Y	Y
				Chapter 7: Environment		ENV8	NC			

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
				Chapter 7: Environment		ENV11	NC			
REP/076	Mrs Jennifer Grace Withall			Chapter 4: Character		CH1	N	Y	Y	Y
						CH5	N	Y	Y	Y
REP/077	Mrs Jane Wilson			Chapter 9: Gatwick		GAT1	N	Y	Y	Y
REP/078	Mr Clive Narrainen		Local Plan	Chapter 4: Character	4.33	CH6	N	Y	Y	Y
REP/079	Homes and Communities Agency		Local Plan	Chapter 5: Economic Growth		EC1	Y	Y	Y	Y
			Local Plan	Chapter 5: Economic Growth		EC3	Y	Y	Y	Y
			Local Plan	Chapter 5: Economic Growth		EC4	Y	Y	Y	Y
			Local Plan	Chapter 5: Economic Growth		EC5	Y	Y	Y	Y
			Local Plan	Chapter 6: Housing		H1	Y			
			Local Plan	Chapter 6: Housing	Tinsley Lane	H2	Y	Y	Y	Y
			Local Plan	Chapter 6: Housing		H4	Y			

Representor Number	Client Name	Agent	Document	Chapter	Paragraph	Policy	Y or N Hearings (NC = No Comment)	Legal Compliance	Sound	Duty to Cooperate
			Local Plan	Chapter 7: Environment		ENV4	Y	Y	Y	Y
			Local Plan	Chapter 7: Environment		ENV11	Y			
			Local Plan	Chapter 9: Gatwick		GAT1	Y			
			Local Plan	Chapter 9: Gatwick		GAT2	Y			
REP/080	Marine Management Organisation		Duty to Cooperate				NC			
REP/081	Arun District Council		Duty to Cooperate				NC			
			Local Plan	Chapter 7: Environment		ENV9	NC			
REP/082	Mr Arshad Khan		Local Plan	All			Y	N	N	N
REP/083	Miss Sarah Fortnam		Local Plan	Chapter 4: Character		CH13	N	N	N	N
			Local Plan	Chapter 6: Housing		H5	N	N	N	N

All Representations Received

Sustainability Appraisal

Representation Number	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/021 (CSC2055193)	Mr. John Cooban	SA	<p>I don't think that the Sustainability Appraisal has dealt with the question of borough-wide (not just council-owned) tree cover adequately.</p> <p>There is reference to Green Infrastructure, but nothing I can see specifically about Tree Strategy as the principal component of Green Infrastructure.</p> <p>We might not have a Tree Strategy at present, but a plan to 2030 should surely include the commitment to formulate and implement one.</p> <p>Draft London Tree Strategy Guidance attached for your reference.</p>	
REP/047 (CSC2055791)	Mayfield Market Towns	SA	PLEASE SEE MAIN REPRESENTATION, INCLUDING SECTION 4, 6 AND 7. ALSO SEE REPORT 2 AND REPORT 4.	
REP/029 (CSC2055795)	Highways Agency	SA	<p>Thank you for inviting the Highways Agency (HA) to comment on the Crawley Borough Council Sustainability Appraisal Consultation.</p> <p>As you are aware, the HA's interest relates to the motorway and allpurpose trunk road network, which is collectively known as the Strategic Road Network (SRN) which we manage on behalf of the Secretary of State. In the case of Crawley Borough Council, our interest relates primarily to the M23 and A23. The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in the Department for Transport (DfT) Circular 02/2013 (Strategic Road Network and the Delivery of Sustainable Development). In the case of Crawley, this includes the M23 Junctions 9, 10, 10a, 11 and the Gatwick Spur, and the A23 to the south of Crawley.</p> <p>Overall, in accordance with national policy, the HA looks to Crawley Borough Council to promote strategies, policies and land allocations which will support alternatives to the car and the operation of a safe and reliable transport network.</p> <p>We provided representation via email on Monday 13th October and stated that we would follow up for completeness with comments on the Sustainability Appraisal. Please find below the Agency's representations in response to the Crawley Borough Council Sustainability Appraisal consultation 2014:</p>	

Representation Number	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>The HA is broadly supportive of Objectives 7 and 8 as listed on page 6, “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,” and, “To ensure the provision of sufficient infrastructure to meet the requirements of the borough.”</p> <p>We note that the sustainability objectives are listed with alternative numbering in table 5.2 therefore it is unclear within table 5.1 which sustainability objective is being assessed within the local plan policies sustainability appraisal overview.</p> <p>Whilst the Sustainability Appraisal notes that significant effects from the Local Plan included an increase in infrastructure need (including transport), no specific infrastructure requirements have been proposed. Although Crawley has excellent transport links, including the M23 and A23, this part of the strategic road network is currently under Stress and the junctions are particularly congested, especially at peak times.</p> <p>The HA wishes to see the proposed housing and employment sites in Appendix G with demonstrable evidence within the Local Plan that the road infrastructure has been planned, even in outline, to cater for the total amount of development. The HA would require improvements to the relevant strategic road network junctions to accommodate residual development traffic, after all other sustainable transport means have been implemented</p> <p>Following the email that we issued on 13th October to forward.planning@ Crawley.gov.uk we note that some of our comments that were transferred by yourselves onto your response templates have not been recorded accurately. In relation to our comments on Policy H1 Housing Provision the modifications that we suggested included ensuring that the Local Plan and Infrastructure Plan were consistent in terms of the number of new houses to be provided. In addition the overall number of houses that are planned to be delivered does not meet the requirements of the NPPF as there is a significant shortfall (of 2,350 houses) compared to the objectively assessed housing needs requirement.</p> <p>The comments related to Policy IN3 New Development and Requirements for Sustainable Transport has not detailed the modifications that we suggested within our email. This includes the incomplete transport modelling evidence base.</p> <p>Conclusion</p>	

Representation Number	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>The HA supports Objectives 7 and 8 of the Crawley Sustainability Appraisal but we still have some concerns over the transport modelling in support of the Local Plan. There appears to be incomplete evidence and the missing gaps prevent the HA from supporting the Local Plan submission. As it stands, presently we cannot consider the transport evidence base as sound in terms of the NPPF test of soundness. The current transport evidence base is insufficient to consider the Local Plan “justified” from a transport viewpoint.</p> <p>As mentioned in our email dated 13th October 2014, we suggest meeting with Crawley Borough Council and West Sussex County Council as soon as is convenient to discuss our requirements for the transport assessment and other matters relating to transport modelling.</p>	

Infrastructure Plan

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/029 (CSC2055795)	Mr Nigel Walkden Highways Agency		In addition the Infrastructure Plan is not consistent with the Local Plan as it states that 4,000 houses will be delivered by 2030. Policy EC1 makes reference to a minimum amount of 35ha of land for business uses will be delivered over the term of the Local Plan. However, within the Infrastructure Plan, reference is made to the number of jobs provided. The HA request that the quantum of employment is clarified.	

Local Plan Map

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments		PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/015 (CSC2055717)	CEMEX UK Operations Ltd.		<p>The National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) in preparing Local Plans to safeguard existing rail heads and associated storage and handling facilities for the bulk transport by rail of minerals [pg 33 Para 143, bullet point 4]. The NPPF also requires LPAs to safeguard existing, planned or potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.</p> <p>The West Sussex Minerals Local Plan (2003) designates Crawley Goods Yard as an Existing Rail Depot and Policy 37 confirms that it will be safeguarded from other forms of development.</p> <p>CEMEX UK Operations Ltd. consider that the draft Proposals Map is unsound as it fails to clearly identify Crawley Goods Yard as a safeguarded rail head and ensure that its future use for rail related uses and aggregate distribution is not prejudiced. It is therefore not in accordance with National Planning Policy and is not justified as it is not the most appropriate strategy.</p>	Designate Crawley Goods Yard as a safeguarded rail head as shown on the attached extract from the adopted Minerals Local Plan
REP/002 (CSC2055736)	Aggregate Industries UK Limited	EC2	<p>The National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) in preparing Local Plans to safeguard existing rail heads and associated storage and handling facilities for the bulk transport by rail of minerals [pg 33 Para 143, bullet point 4].</p> <p>The NPPF also requires LPAs to safeguard existing, planned or potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.</p> <p>The West Sussex Minerals Local Plan (2003) designates Crawley Goods Yard as an Existing Rail Depot and Policy 37 confirms that it will be safeguarded from other forms of development. Aggregate Industries consider that the draft Proposals Map is unsound as it fails to clearly identify Crawley Goods Yard as a safeguarded rail head and ensure that its future use for rail related uses and aggregate distribution is not prejudiced. It is therefore not in accordance with National Planning Policy and is not justified as it is not the most appropriate strategy.</p>	Designate Crawley Goods Yard as a safeguarded rail head as shown on the attached extract from the adopted Minerals Local Plan.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/022 (CSC2056817)	Day Group Ltd.		<p>The National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) in preparing Local Plans to safeguard existing rail heads and associated storage and handling facilities for the bulk transport by rail of minerals [pg 33 Para 143, bullet point 4].</p> <p>The NPPF also requires LPAs to safeguard existing, planned or potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.</p> <p>The West Sussex Minerals Local Plan (2003) designates Crawley Goods Yard as an Existing Rail Depot and Policy 37 confirms that it will be safeguarded from other forms of development.</p> <p>Our clients find that the draft Proposals Map is unsound as it fails to clearly identify Crawley Goods Yard as a safeguarded rail head and ensure that its future use for rail related uses and aggregate distribution is not prejudiced. It is therefore not in accordance with National Planning Policy and is not justified as it is not the most appropriate strategy.</p>	Designate Crawley Goods Yard as a safeguarded rail head as shown on the attached extract from the adopted Minerals Local Plan.
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council		<p>Mineral safeguarding</p> <p>The adopted West Sussex Minerals Local Plan (2003) safeguards three mineral railhead sites in Crawley at Tinsley Lane, near Three Bridges. The adopted Plan, through Policy 37, safeguards such sites from other forms of development to ensure adequate facilities for the transportation of minerals by rail are available. This includes impacts of other development at neighbour sites, which may give rise to complaint regarding the nature and operation of the safeguarded sites.</p> <p>These sites are critical to the movement of aggregates into and out of the County, and particularly important in relation to the supply of aggregates such as crushed rock which is not available indigenously. The availability of minerals is key to the development of housing and infrastructure as well as the economy.</p> <p>The County Council is working to prepare a new Minerals Local Plan (MLP) for West Sussex in partnership with the South Downs National Park Authority. Early engagement and evidence gathering confirmed the strategic importance of the safeguarded railhead sites. In line with national planning policy, the new Plan will continue to recognise this important infrastructure through safeguarding and the possible identification of a Mineral Consultation Area.</p> <p>The County Council requires that the safeguarded mineral sites be reflected on the Crawley Local Plan Policies Map prior to adoption of the Plan. Minerals Consultation Areas should also be shown on the Policies Maps across the County and we suggest these are identified to be included in the future. The County Council would also</p>	The County Council requires that the safeguarded mineral sites be reflected on the Crawley Local Plan Policies Map prior to adoption of the Plan. Minerals Consultation Areas should also be shown on the Policies Maps across the County and we suggest these are identified to be included in the future. The County Council would also support the inclusion of a reference in the Crawley Local Plan to confirm the safeguarded status of the mineral sites. This could usefully link to the proposed allocation for mixed use recreation/residential at Tinsley Lane, to confirm that prospective developers must have regard to impacts on the safeguarded sites in preparing their scheme and planning application.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			support the inclusion of a reference in the Crawley Local Plan to confirm the safeguarded status of the mineral sites. This could usefully link to the proposed allocation for mixed use recreation/residential at Tinsley Lane, to confirm that prospective developers must have regard to impacts on the safeguarded sites in preparing their scheme and planning application.	
REP/051 (CSC2055590)	Mr David Payne (Mineral Products Association)		Para 143 of the NPPF requires local plans to safeguard existing, planned and potential storage, handling and processing facilities for bulk transport [of minerals] by rail...and existing, planned and potential sites for concrete batching, manufacture of coated materials, other concrete products and the handling, processing and distribution of recycled and secondary aggregate material.	The Map should identify the safeguarded Crawley Goods Yard (as identified in the West Sussex Minerals Local Plan).
REP/072 (CSC2055889)	The Wilky Group Simon Fife (Savills)		PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS	PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS
REP/001 (CSC2055715)	Airport Industrial Property Unit Trust		Crawley Submission Local Plan Map The Airport Industrial Property Unit Trust (AIPUT) owns an interest in a number of industrial and warehouse units at two locations on the southern side of Gatwick Airport, namely the Gatwick Gate Industrial Estate and Viking House. These units form part of the area known as the Lowfield Heath Employment Area in the Crawley Submission Local Plan. AIPUT supports the inclusion of the Viking House Site within the boundary of Gatwick Airport upon the Crawley Submission Local Plan Map. The inclusion of the Viking House Site within the Airport boundary is consistent with the Gatwick Airport Masterplan 2012, prepared by the airport operator, which identifies the site as lying within the Airport boundary and for ancillary land uses/acitivities required to support the operation of the Airport. The inclusion of the Viking House Site within the Airport boundary is also consistent with Crawley Borough Council's Gatwick Airport Supplementary Planning Document, November 2008. Appendix 1 to this document shows the Site as being within the Airport boundary.	
REP/046 (CSC2054416)	Manor Royal BID Company		MRBD Limited defines the geographical area of the Manor Royal Business District differently from the area indicated in the Local Plan and on the Local Plan Map. While this may not make the plan "unsound" we regard the northeastern boundary of Manor Royal to be marked by the roads James Watt Way and Steers Lane.	Make the area City Place distinct from the core area that is regarded as the Manor Royal Business District, which is bounded by James Watt Way and Steers Lane.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			We regard City Place as having a separate and distinctive brand, look and feel quite apart from that of the Business District. We feel it would be beneficial to make this distinction clear and to define these areas separately in the same way that Lowfield Heath is defined separately. In the Manor Royal Masterplan (GVA, 2010) City Place and County Oak are referred to as "fringe areas" to the core area.	
REP/055 (CSC2055721)	T & L LLP Rapleys		For clarity, and to accurately reflect the County Oak area's retail function and the recommendations of the evidence base documents, we request that the Key Diagram and Proposals Map should identify the County Oak retail area, including the Betts Way site.	
REP/038 (CSC2055226)	Mr Bill Sanders (Lynton Developments) Mr Keith Webster (Ancer Spa)		The Upper Mole Farmlands Rural Fringe Policy area CH9 extends south to Hydehurst Lane. However the Gatwick Safeguarded Land Policy area GAT 2 boundary is further to the north of Hydehurst Lane. If this 3ha area between Hydehurst Lane and the GAT 2 boundary remains in CH9 it would be inconsistent with written policy EC1 Sustainable Economic Growth.	There is an area of approximately 3ha north of Hydehurst Lane but south of the Gatwick safeguarding boundary that should be removed from the CH9 policy area and should instead be allocated for employment purposes as an extension to the Manor Royal strategic employment area. The reasons are to provide additional much need employment land as explained in our representations to policy EC1 Sustainable Economic Growth.
REP/030 (CSC2055631)	Mr C Heyman DPDS Consulting		The uncertainty surrounding the expansion of Gatwick Airport means that certain sites need to be treated with a degree of flexibility to ensure that they are deliverable in the future, whatever the Governments final decision. The information set out below refers to a particular site where such a flexible land use allocation strategy should be adopted.	The Local Plan currently identifies a site located between Steers Lane, Balcombe Road and Radford Road as part of the north east sector for housing development (Policy H2), however whilst this allocation is welcomed by the land owner and which he wishes to see retained within the Local Plan, there also needs to be recognition that a potential second runway at Gatwick Airport would subsequently blight the site for residential development due to noise implications due to the site sitting adjacent to the airport safeguarding zone (Policy GAT2) In the scenario that Gatwick Airport becomes the Governments preferred option for expansion, the potential for airport use or airport compatible uses

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>should be recognised and kept as an option in order to adopt a realistic and pragmatic approach to delivery of development on the site. Obviously should Gatwick Airports current bid fail then the sites residential potential would be realised. Our clients have discussed such proposals with members of Gatwick Airports expansion bid team, who agree with this approach as they would not wish to see applications made for residential development in such close proximity to an expanded airport for obvious reasons. Our client wishes to work collaboratively with key stakeholders within the local area and it is considered this flexible approach to land use allocation on this site would future proof the plan and allow for such circumstances to be taken into consideration in the compilation of housing delivery figures within the Borough.</p> <p>DPDS would be happy to elaborate the above information if required however at this time on behalf of our client respectfully request that the Local Plan Map and appropriate policies are modified to take into consideration the scenario set out above and so to ensure that the Local Plan is sound in terms of deliverability and not out of date as soon as it is adopted.</p>
<p>REP/053 (CSC2055429)</p>	<p>RSPB Miss Louise Richardson</p>		<p>Though policies within the local plan on nature conservation and biodiversity (ENV1: Green Infrastructure and ENV2: Biodiversity) do state that the local and national ambitions to maintain and increase biodiversity are possible, this is only achievable by including urban initiatives (The Urban Biodiversity Action Plan as stated in paragraph 7.18 of the local plan). The means set out to achieve this are by embedding policy ENV2 in planning policy (paragraph 7.16) and by “incorporating features to encourage biodiversity”. Yet, paragraph 7.17 highlights the areas of biodiversity within Crawley on the Local Plan Map as a small fraction of the town.</p> <p>Urban wildlife is not restricted to gardens and green spaces; it is located in every corner of Crawley. Whilst the Local Plan Map identifies Biodiversity Opportunity Areas aimed at restoring or recreating habitats, it should also be recognised that all developments in urban areas can contribute to that ecological network.</p>	<p>The whole of Crawley has the potential to increase biodiversity, and we suggest that the Local Plan encourages all developments to do so. By including bird boxes, swift bricks, raised gaps in fences and other simple and cost effective features within planning policy for new and existing properties, and maintaining habitable areas (no matter how small) it is possible for every built up area in Crawley to achieve biodiversity benefits. Therefore, a more open approach is needed to identify areas of biodiversity potential, which in turn would make the achievement of policies ENV1 and ENV2 far easier.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				We recommend that Policy ENV2 is amended to read: All development proposals will be expected to incorporate features to encourage Biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.
REP/070 (CSC2055849)	Universities Superannuation Scheme Deloitte		<p>USS partially supports and partially objects to Policy EC2. USS own Denvale Trade Park ('DTP') on Haslett Avenue (site ownership plan attached). The DTP borders the designated Town Centre Boundary covered by Policies EC5, EC6, EC7 and H2, but is not included in this area. We understand from discussions with the Council that DTP should be considered as 'out of centre', but Policies EC5, EC6, EC7 and H2 should still apply.</p> <p>The current policy wording and map show DTP as being part of the Main Employment Area which covers the rest of the town centre, however DTP is an established employment site and should be included in the Policy EM2 list of identified Main Employment Sites since this would be consistent with the policy map and current use. The policy states that proposals for employment generating development in the Main Employment Areas will be supported where they contribute to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses. USS supports the reference to 'employment generating uses', but requests that the text is amended to be more flexible in accordance with Paragraphs 14 and 17 of the NPPF. Suggested amendments are set out in box 7 below.</p> <p>In addition, the policy states that proposals that would involve a net loss of employment floorspace will only be permitted where they are able to demonstrate that (i). the site is no longer suitable, viable or appropriate for employment purposes; and (ii). the loss of any floorspace will result in a wider social, environmental or economic benefits to the town; and (iii). there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.</p> <p>The emerging Local Plan should adopt a more flexible approach to the management of employment land, which avoids the long term protection of employment sites that are no longer viable and promotes flexibility in the range of acceptable uses, in accordance with paragraphs 14, 17 and 22 of the NPPF. Please see box 7 for suggested amendments.</p>	<p>Policy EC2 should be amended to include Denvale Trade Park in the list of Main Employment Sites. The current policy wording and policy map is inconsistent and does not reflect DTP's current use.</p> <p>Policy EC2 should be amended to explicitly clarify that A1, A2, C1, D2 or sui generis uses are considered to be employment uses which can positively contribute to employment provision and that the reference to 'employment uses' is not restricted to just B uses. Denvale Trade Park's location adjacent to the town centre means that such uses could be appropriate and sustainable.</p> <p>The policy should recognise that alternative employment uses, such as hotels, can complement existing business functions and offer a higher density of employment opportunities than some B uses, such as warehousing. This more flexible approach would be compliant with Paragraphs 14 and 17 of the NPPF.</p> <p>USS requests that main employment areas in the district are not unreasonably safeguarded. The emerging Local Plan should adopt a flexible approach to the management of employment land, which avoids the long term protection of employment sites that are no longer viable and promotes flexibility in the range of acceptable uses, in accordance with paragraphs 14, 17 and 22 of the NPPF. This supports the reuse of brownfield in accordance with NPPF paragraph 111 which states that 'Planning policies and</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.</p>

Duty to Cooperate

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council	DTC	MVDC recognises the positive outcome from a cooperative approach to meeting housing needs, involving joint working with Horsham, Mid Sussex and Reigate and Banstead Borough Council. MVDC agrees that these are the most appropriate locations for urban extensions to meet identified housing needs (see also MVDC's response to the Duty to Cooperate Statement for the Crawley Borough Local Plan 2015-2030, August 2014).	
REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council	DTC	With respect to employment land, MVDC notes that there is an unmet need for employment land within Crawley Borough and that Crawley BC intends to work with the Gatwick Diamond LPAs to investigate the most appropriate locations for employment growth close to Crawley and Gatwick Airport. For reasons set out in MVDC's response to the Duty to Cooperate Statement, the southern part of Mole Valley is heavily constrained by Green Belt policy and other issues including flooding, noise and poor transport connections. These constraints are likely to weigh against any significant provision of new employment land in the rural areas in the south of Mole Valley. Nevertheless, MVDC will continue to work with neighbouring authorities through the Gatwick Diamond initiative and in partnership with the Coast to Capital LEP which provide the appropriate framework for strategic employment issues to be addressed in a co-ordinated manner.	
REP/080 (CSC2058555)	Marine Management Organisation	DTC	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation. If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.gov.uk/mmo	
REP/081 (CSC2058553)	Arun District Council	DTC	Thank you for consulting Arun District Council on your Proposed Submission Local Plan and accompanying maps and documents. After reviewing these we have the following officer response, that will be presented to our Subcommittee at the end of October and then Council for final sign off. We understand that CBC is working closely with its adjacent authorities who have agreed to seek to accommodate CBC's unmet need. It is noted that there is a slight inconsistency between the numbers within the Duty to Cooperate Statement (August 2014) and the Housing policy of the Plan. It is presumed this is due to the base year that is being used but slight clarification before submission may be helpful. As mentioned within the response to the Duty to Cooperate request, there is	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			expected to be an under supply in terms of neighbouring areas meeting their need, that is a recognised characteristic of the Sussex Coast Housing Market.	
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	DTC	<p>We note that Crawley Borough Council has concluded that it is unable to meet its objectively assessed housing needs, and can confirm that CBC have engaged with Reigate & Banstead in respect of this issue.</p> <p>Whilst we do not consider the plan itself to be unsound, we have some comments about the evidence base.</p> <p>Local Housing Market Areas: Reigate & Banstead falls within the East Surrey Housing Market Area, although the presence of London 'on the doorstep' has an impact on movements across the wider area. This is confirmed by work by DCLG which suggests that the borough falls within the wider London HMA and the local London (South West) HMA: the Crawley HMA sits to the south of Reigate & Banstead Borough, although there are some localised movements between the southern part of the borough and Crawley.</p> <p>Housing supply in Reigate & Banstead: The Reigate & Banstead Core Strategy was examined in 2013. At the examination it was recognised that, whilst the borough was able to provide sufficient housing to meet the full need arising from within the local population, it was not able to fully meet its objectively assessed housing needs taking into account in-migration pressures (even allowing for release of Green Belt land for development). As such RBBC is committed to working closely with other authorities (including those within the East Surrey HMA and North West Sussex HMA) to understand the extent to which housing needs across the area can be met and to secure the delivery of much needed new homes.</p> <p>Migration into RBBC: Cooperation between RBBC and CBC resulted in clarification in our Core Strategy that our housing figure does allow for some continuing in-migration from other local authorities, including those within East Surrey and North West Sussex. Our Core Strategy does not however, make specific (quantified) allowances for in-migration from individual boroughs. This is due to the complexities of the housing market area for Reigate & Banstead and the inability to control where those who purchase market housing in the borough originate from. We note the figure of 50 dwellings per year identified in the Unmet Needs Topic Paper, however this is not derived from our own policy or evidence base.</p>	Whilst we do not seek changes to the Local Plan as submitted, we would not support the inclusion of a quantified proportion of the Reigate & Banstead housing target 'allocated' to meet Crawley's needs as in reality this would not be achievable, and the suggested figure may not be realistic taking into account migration pressures into Reigate & Banstead from, for example, London.
REP/054 (CSC2055476)	Ms Cath Rose	DTC	Whilst we do not consider the plan itself to be unsound, we have some comments about the evidence base.	We do not seek modifications to the Local Plan as currently worded, however we would not support any assumption or expectation at this stage that

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	Reigate and Banstead Borough Council		<p>Employment: We do not object to the overall approach to employment land provision in the CBC Local Plan and appreciate the problems that the current uncertainty about the future for Gatwick Airport poses for the Council. In that respect, we support the approach set out in Policy EC1. We would, however, like to clarify Reigate & Banstead's own plans for employment land provision as we feel that these have been misinterpreted in the Unmet Needs Topic Paper. Table 5 of this paper presents 'planned strategic employment developments Crawley or within neighbouring authorities'. It incorrectly identifies the employment growth in our Core Strategy as being strategic development in fact this provision is to meet Reigate & Banstead's own local needs. It would not therefore be 'available' to fulfil the local needs of any adjoining authority, and no additional 'headroom' has been identified in the borough to meet the needs of neighbouring authorities.</p> <p>The 'green blobs' in Appendix B of the paper do not correspond with our local employment areas.</p> <p>We have recently commissioned work to scope out the possibility of additional employment development in the borough to meet 'strategic needs' (defined as growth that falls outside of local demand and needs). However we do not yet have the conclusions of this work, nor have we made any policy provision for such development.</p>	<p>Reigate & Banstead Borough has capacity to meet some of the unmet local employment needs of Crawley Borough as this would not be supported by our own evidence of potential future supply. We will continue to work with CBC and other Gatwick Diamond authorities as we prepare detailed site allocations and receive the findings of our scoping work in relation to strategic employment needs.</p>
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	DTC	<p>We acknowledge the role of Crawley as a sub-regional retail destination. At the same time, Redhill is recognised as a strategic centre of significance in the retail hierarchy. It is therefore important that proposals for the two town centres are complementary.</p> <p>RBBC is committed to working with CBC to ensure that a coordinated approach to retail provision can be taken where both Crawley and Redhill can fulfil their respective roles. RBBC had previously made representations to CBC that the original scale of growth planned for Crawley Town Centre (through the Town Centre North development) could have a significant impact on proposals for retail/regeneration plans for Redhill, and expressed concerns about the conclusion of the 2010 Retail Capacity and Impact Study that an impact of 6.1% on Redhill was 'insignificant'.</p> <p>We note from the latest Retail Capacity Study Update (2013) that the latest proposals for sites in the north of the Town Centre anticipate a smaller quantum of comparison floorspace, and the conclusion that there is therefore no need to undertake detailed testing of the likely impact on surrounding town centres as the impact of a larger scheme has been fully tested.</p>	<p>Inclusion of information in policy about the total quantum of retail growth proposed ('up to xxxsqm') for Crawley Town Centre, supported, if required, by evidence demonstrating that proposals will not have a significant impact on nearby town centres such as Redhill.</p> <p>This will provide certainty about the planned level of growth, and limit the risk that further amendments to proposals for Crawley town centre (for example a revived Town Centre North scheme) will have a negative impact on proposals for nearby town centres.</p>

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			<p>There does not, however, appear to be any information in the Local Plan about the quantum of retail (comparison) growth proposed for Crawley town centre or any information about the phasing of new development.</p> <p>We support the principle of the growth of Crawley Town Centre, subject to this being of a scale that allows the potential of Redhill to also be fulfilled.</p> <p>This principle has been agreed through the Gatwick Diamond Local Strategic Statement (2012) which identifies that 'the scale of growth in Crawley should not be such as to prevent other town centres from continuing to play an effective role for their local communities'.</p> <p>Without an identified quantum of growth set out in Local Plan policy, or phasing information, we cannot be certain that proposals for retail growth in Redhill and Crawley are complementary, or that this shared objective will be realised.</p>	
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	DTC	<p>Whilst we do not consider the plan itself to be unsound, we seek some further clarification about CBC's approach to this issue. We are supportive of the approach taken by CBC to assessing the accommodation needs of Gypsies, Travellers and Travelling Showpeople, and through joint working at the Gatwick Diamond level have shared our Traveller Accommodation Assessment (TAA) methodologies to help ensure complementarity.</p> <p>RBBC undertook a TAA in 2013, and is currently in the process of updating that study. Whilst - in line with the agreed approach across the Gatwick Diamond - we are committed to meeting our identified needs as far as possible, we have not yet been able to conclude whether sites can be allocated in RBBC to meet the full need identified within the TAA without compromising the purposes or integrity of the Green Belt. We recognise that CBC also faces a variety of constraints when it comes to the provision of traveller sites. We would therefore wish to continue to work together with CBC and other nearby authorities to understand how the needs of RBBC could be met in the event that we are unable to meet them within our own borough.</p>	We would suggest that Policy H5 or the reasoned justification be amended to make reference to joint/cross boundary working in relation to Gypsy and Traveller accommodation provision.
REP/012 (CSC2055687)	Bupa Care Services	DTC	<p>Have the Council complied with their Duty to Cooperate? The NPPF requires LPAs to meet their own housing need as well as the needs of other authorities in the same Housing Market Area (HMA) as far as is consistent with the policies set out in the NPPF.</p> <p>As previously highlighted Local Plans should be based on a clear strategy which seeks to meet OAN, and this includes the OAN of the overall identified HMA that a Borough falls within. Integral to meeting OAN is understanding what the housing requirements and supply capacity of other authorities in the HMA are and whether they have any capacity to meet unmet need or indeed if they have any unmet need</p>	

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			<p>that needs to be met from the wider HMA. Without this important information, development and growth cannot be properly planned for.</p> <p>Crawley falls within the North West Sussex HMA, which comprises Crawley, Mid Sussex, Reigate and Banstead and Horsham. Apart from Reigate and Banstead these are not Green Belt authorities and therefore in the large do not have the same restrictions of other authorities in the area. It is also relevant that none of these authorities are adequately planning for housing need. Horsham in particular has lost a number of sizable appeals on the basis of housing need. This is due to the fact that its Core Strategy pre-dates the NPPF and as such does not adequately plan for housing need. Horsham is currently preparing a more up to date Local Plan to try and address this issue; however it is still not proposing to allocate enough land for housing. This clearly is an example of the Local Plan process being carried out inadequately, and is a mistake that Crawley should not seek to emulate.</p> <p>None of the authorities in the North West Sussex HMA are prepared to help meet each other's unmet need. From an initial review of housing need in Reigate and Banstead, Horsham and Mid Sussex these Boroughs are only looking to address their own housing need. Indeed Reigate and Banstead have adopted a Core Strategy Local Plan that has deliberately adopted a housing target that is at least 140 dwellings less than its OAN. Thus placing an onerous requirement on the other three Borough's, including Crawley, to make up the shortfall. Horsham are also not proposing a housing figure that seeks to address wider unmet housing need.</p> <p>Therefore it is clear that the HMA of North West Sussex is not working in the proper manner. They are not taking a holistic approach to the issue, or accepting their duty to cooperate. The HMA has to be assessed and planned on a holistic basis. Yet it is clear that considerable joint working between all of the authorities is needed if the HMA is to properly provide for social and economic growth. All of the authorities in the HMA acknowledge that they cannot meet their housing and employment needs within their own boundaries. However, identification of this does not remove their duty under Section 33A of the Localism Act 2011 to maximise the effectiveness of the plan making processes to find a solution. Given the stage of the Crawley Local Plan, and indeed that of Horsham, there is currently the opportunity to drive this process and stimulate proper planning in the HMA. This opportunity should be embraced not ignored.</p> <p>We do not consider, after reviewing the Council's draft Duty to Cooperate Statement (August 2014) that it has fully explored opportunities for joint working with the other authorities in its HMA. It does not detail how Crawley's unmet housing need will be addressed; it merely states that solutions will need to be identified. However, it is the purpose of the Local Plan process to identify such solutions; not to kick them into the long grass hoping that either a neighbouring authority will deal with the unmet need,</p>	

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			<p>or ignoring the issue completely. Also by not assessing the issue of unmet need, the Local Plan is inherently flawed as it will not deliver what the Borough and its population requires. The NPPF and NPPG are clear in their stance towards unmet housing need, namely that it needs to be resolved through the Local Plan that is being prepared and submitted for examination, not through a future round of plan making.</p> <p>As a final point on this matter, none of the North West Sussex HMA authorities are providing for unmet need coming from London. Recent evidence published in a study by Nathaniel Lichfield & Partners suggests that Home County boroughs with strong links to London need to provide for an overspill of London's need of up to 5,000 dwellings each. All of the North West Sussex HMA authorities have clear and direct links with London, yet there is no evidence that the additional need that these links create has been taken into account and factored into any of the need figures that are being worked towards. This is a significant flaw.</p> <p>It is therefore imperative that local authorities in an identified HMA establish proactive working relationships with one another and make robust commitments to work together.</p> <p>There are positive examples of this throughout the Country. However, this has not been achieved in this instance. The NPPG is clear in its requirement that LPA's "will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters". It is acknowledged that there is a commitment to future working between the authorities of the West Sussex HMA; however there is no evidence that any solution is likely to be identified. Therefore, whilst the commitment is commendable it does not go far enough to ensure that positive sustainable planning is achieved.</p> <p>As a result of this we consider that the Council has not fulfilled its obligations under s33A of the Localism Act, as such the Local Plan does not comply with the NPPF. The plan fails to adequately address the Council's obligation of meeting OAN and does not provide robust solutions as to how unmet need across both it and the wider HMA can be achieved. It is therefore unsound and not legally compliant.</p>	
REP/013 (CSC2055701)	Crest Strategic Projects	DTC	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/074	West of Ifield Consortium:	DTC	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
(CSC2055720)	Rydon Homes, Wates Developments and Welbeck Strategic Land LLP			
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	DTC	<p>see detailed attached representation.</p> <p>The plan is unsound because it does not provide a satisfactory resolution to the problem of Crawley's acknowledged but unmet housing need. As such the plan fails the positively prepared test of the NPPF.</p> <p>**see attached for detailed reps**</p> <p>Concluding remarks below: Summary The challenges emanating from London, plus the unmet need in RBBC consequent upon that Council deciding to meet local needs only, plus the challenges emanating to the south of the HMA from the Sussex Coast authorities, points to the importance of the issue of Crawley's unmet need being addressed now. The problem must be confronted through the series of plans that are currently being prepared by Crawley, Horsham and Mid-Sussex. Neglecting the issue of Crawley's unmet need at this juncture will only worsen the already serious housing crisis in the south east of England.</p> <p>We are conscious that the North West Sussex HMA authorities have signed-up to a Joint Position Statement. This is entitled the Northern West Sussex Authorities Position Statement (revised July 2014). As discussed above, this refers to Crawley's difficulties but makes no commitment to an orchestrated review of the collective local plans of the HMA to resolve the problem.</p> <p>RBBC provided one of the best avenues open to resolve Crawley's problem, but now it has an adopted plan, this opportunity has been lost, despite its relationship to the West Sussex HMA being of a lesser degree (as paragraph A.7 of the DTC Statement acknowledges).</p> <p>All the other three authorities of the HMA have had the opportunity to prepare aligned plans but they have chosen not to. These three core authorities of the HMA have all been preparing plans to largely similar timetables and given the time available it would have been feasible for Horsham and Mid Sussex to each have</p>	As such we are forced to conclude that Crawley's plan is unsound because it is not the product of positive planning to grapple with the question of Crawley's unmet need. It has been rendered unsound by the lack of cooperation from its partners in the HMA. Unfortunately, this is partly Crawley's fault for not objecting to the plans of its neighbours.

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			<p>provided some land to accommodate an element of Crawley's need. This unique opportunity appears to have been squandered.</p> <p>It is evident from reading the Joint Position Statement that collaboration to find a solution to the housing question has not been achieved. Each authority pleads its own special circumstances (paragraph 6.3) maintaining that they are individually doing what they can to meet their own needs (paragraph 6.16). Evidence of a willingness to cooperate to provide a tangible and effective outcome has not been demonstrated. The lack of a firm commitment is evident in paragraph 3.1 of the Joint Position Statement. This states: "To respect each other's right to develop their own plans that fit the specific circumstances of the District/Borough's communities." Effectively, this is an agreement to disagree.</p>	
REP/047 (CSC2055791)	Mayfield Market Town	DTC	PLEASE SEE FULL REPRESENTATION, INCLUDING SECTION 4 AND 6 AND ALSO REPORT 1 AND 3.	
REP/033 (CSC2055843)	Horsham District Council	DTC	<p>HDC confirms that it considers the Crawley 2030 Local Plan to be both legally compliant and 'sound' in relation to meeting the statutory Duty to Co-operate. Joint working across the two local authority areas pre-dates its formalisation through the Gatwick Diamond Initiative and the statutory Duty to Co-operate imposed by the Localism Act 2011.</p> <p>This representation has been prepared in the context of:</p> <ul style="list-style-type: none"> • Ongoing joint working as neighbouring Local Authorities; • The delivery of 2,500 new homes in a new neighbourhood adjacent to Crawley (Kilnwood Vale) through the 'West of Bewbush Joint Area Action Plan' (2009), prepared and adopted jointly by both Authorities; • The commissioning of joint evidence (in conjunction with MSDC) as part of the Northern West Sussex Authorities; and • Ongoing joint working as part of the Gatwick Diamond, including the adoption of the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement. <p>A number of jointly prepared strategic evidence base documents have recently been commissioned to support the preparation of the individual authorities' Local Plans. These were jointly commissioned by CBC, HDC and MSDC, and include:</p> <ul style="list-style-type: none"> • Joint Northern West Sussex SHMA - limited update (October 2014) • Joint Northern West Sussex Strategic Housing Land Availability Assessment - strategic sites (pending, prepared jointly 'in-house') • Joint Northern West Sussex Economic Growth Assessment (2014) 	

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			<ul style="list-style-type: none"> Joint Northern West Sussex SHMA - update (2012) New Market Town Study (2010) At Crawley Study (2009) Joint Northern West Sussex Economic Appraisal and Employment Land Review (2009/2010) Joint Northern West Sussex SHMA " final report (2009) <p>The outcomes of the most recent housing and employment studies formed the basis for the 2014 updated Position Statement which shows how the Northern West Sussex Authorities intend to meet their objectively assessed housing and economic needs, as far as is consistent with the policies set out in the NPPF and the local evidence base prepared as part of the Local Plan process, to ensure each Local Authority achieves sustainable development to support positive economic growth.</p> <p>In addition, the Gatwick Diamond Authorities jointly prepared and signed a Memorandum of Understanding (published March 2012), which formalised the framework for cooperation between the 'Gatwick Diamond' Local Authorities with respect to strategic planning and development issues. It sets out the way in which the authorities consult one another and work together on matters which affect more than one Local Authority area, and recognises the need to deliver sufficient housing to support the growth of the Gatwick Diamond economy in accordance with the Gatwick Diamond vision. Both CBC and HDC are among the authorities who have adopted the Gatwick Diamond MoU.</p>	
REP/062 (CSC2055844)	Sussex Police	DTC	Sussex Police welcomes joint working with Crawley Borough Council, as set out in the Duty to Cooperate Statement, and are pleased to be included as a formal Statutory Consultee in Appendix 3 of that document. It is hoped that the availability of dedicated resources will now enable policing infrastructure to be discussed in strategic joint working in the future.	
REP/050 (CSC2055768)	Pegasus Group Persimmon Homes	DTC	<p>Our comments are prepared on behalf of Persimmon Homes Thames Valley and Taylor Wimpey Ltd:-</p> <p>1.2 The Duty to Cooperate, as introduced through Section 110 of the Localism Act and applied through Section 33A of the Planning & Compulsory Purchase Act 2004, requires local planning authorities to work together on cross-boundary strategic issues. This includes the delivery of housing to ensure the full objectively assessed housing needs and associated infrastructure requirements can be met in full. The Borough Council has prepared a Duty to Cooperate Statement (DTC) (August 2014) to demonstrate how it considers the duty has been met.</p> <p>1.3 The Crawley Local Plan Submission document has been prepared on the basis that the borough council cannot meet the housing and employment needs of its growing population within its own boundaries in full. (Local Plan paragraph 1.35).</p>	

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			<p>1.4 We have made separate representations in respect of the identified Objectively Assessed Housing Need (OAHN) but it is necessary to reiterate the fact that housing provision identified in the Local Plan (Policy H1) results in a shortfall in planned housing delivery against the OAHN of at least 3,000 dwellings.</p> <p>1.5 Crawley's housing market functions within a wider Housing Market Area (HMA), the West Sussex HMA, which has been supported by joint Strategic Housing Market Assessments being prepared by the Crawley Borough, Horsham and Mid Sussex District authorities. The DTC Statement also recognises the pressures associated within Coastal Sussex, in particular Brighton and Hove City, and the wider London context which must also be taken into account when considering the implications of delivering Crawley's unmet housing needs within its adjoining authorities.</p> <p>1.6 It is recognised that the DTC is not a duty to agree, but it is a requirement that local planning authorities make every effort to secure the necessary cooperation on strategic cross-boundary matters before they submit their Local Plans for Examination.</p> <p>1.7 The PPG (Paragraph: 011 Ref ID:9-011-2140306) confirms that cooperation should produce effective policies on cross boundary strategic matters and the Duty is unlikely to be met by an exchange of correspondence, conversation or consultation between authorities alone. The DTC Statement provides an overview of how the Duty has been met in respect of housing requirements, however there is a lack of any definitive solutions, strategies or policies to address the unmet housing requirements.</p> <p>1.8 In this respect we refer to the PPG (ID 9-001-20140306) which states that: "local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters".</p> <p>1.9 With this in mind it is necessary to review the planning policy situation in the neighbouring authorities in order to determine the extent to which the authorities have worked collaboratively in identifying unmet need and putting in place strategies to respond to housing pressures.</p> <p>1.10 The Mid Sussex Submitted District Plan was withdrawn in May 2014 as result of the conclusions of the Examination Inspector that the Duty to Cooperate had not been met. The withdrawn plan proposed a housing requirement of 10,600 dwellings over the Plan period 2011-2031 which equates to 530 dpa. Further information set out in the DTC Statement suggests that this planned level of housing growth will be retained. This level of planned growth is consistent with the 2011-based Household</p>	

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			<p>Projections which demonstrates that housing provision within Mid-Sussex is intended to meet locally generated demographic need and as such no provision/allowance is made capacity to accommodate additional growth to contribute to the unmet needs of Crawley.</p> <p>1.11 The Horsham Local Plan currently subject to Examination includes a housing requirement which equates to 650pa, providing 13,000 dwellings over the Plan period. This compares with the DCLG 2011-based Household Projections which suggest a level of need in the region of 14,000 dwellings over the Plan period. The robustness of the Local Plan's housing requirement is yet to be tested through the Examination process but it is clear that the scale of proposed provision (i.e. 13,000 homes) falls below the level projected through the Household Projections and demonstrates that the Horsham Local Plan is not making any provision for accommodating the unmet needs of Crawley.</p> <p>1.12 The Inspectors Report on the Reigate & Banstead Borough Council Core Strategy Local Plan concluded that the full, objectively assessed need for housing over the plan period is an annual average of between about 600 and 640 dwellings, giving a total of 9,000 – 9,600 dwellings over the Plan period. The Council argued, and this was accepted by the Inspector that 460dpa was all that could sustainably be provided. It should also be noted that Inspectors Report (paragraph 29) concluded that approximately 330-370 dwellings would be required each year to accommodate natural change, the remainder of the 460 providing for net in-migration.</p> <p>1.13 Furthermore the Inspector's Report raises concern with the Plans housing requirement in that: "it is based on limited up-to-date evidence and interim rojections that only go to 2021. When longer term 2011 Census-based projections become available the Council should consider, in conjunction with neighbouring authorities, whether new assessments of the scale of need are required for the relevant housing market areas." (paragraph 30).</p> <p>1.14 It is evident that the housing provision set out in the Reigate and Banstead Core Strategy Local Plan is sufficient to meet local demographic need with very little additional provision to provide for net in-migration. The concerns expressed by the Examination Inspector relating to the limited available up-to-date evidence to support the adopted housing provision and calls for future review as part of wider cross boundary assessment of need, undermines any conclusions that the Reigate & Banstead Local Plan actively addresses unmet outside of its administrative boundaries.</p> <p>1.15 In respect of London we set out in our separate representations on the OAHN for Crawley that the proposed housing requirement fails to properly consider the</p>	

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			<p>implications of 'Further Alterations to the London Plan' (FALP) which deals with future migration trends as well as its evidence base which demonstrates the significant housing needs for the City. The London SHMA published in 2013 concluded that London requires between 49,000 and 62,000 homes a year if it is to meet needs. The base date for the SHMA is 2011 and it should be noted that the City has failed to meet current London Plan targets in 2011/12 and 2012/13, consequently the backlog will need to be adjusted further to allow for recent shortfalls.</p> <p>1.16 The FALP also provides a number of future migration scenarios and of particular relevance is the FALP "Central" scenario which assumes an increase of 5% for out-migration and a decrease of 3% for in-migration from London. An alternative "Low" scenario, which assumes domestic migration trends to pre-2008 levels would result in out-migration increasing by 10% and in-migration decreasing by 6%. The Crawley Local Plan and the DTC statement fail to recognise, and set in place a coherent and meaningful process of engagement to address the implications of future migration flows in to and out of London, changes which are likely to increase the scale of household growth in the North West Sussex HMA.</p> <p>1.17 The wider implications of London has not been considered when assessing Crawley's needs and in particular what affect the demand pressures emanating from London will have on Crawley and its neighbouring authorities. Evidence from the Mayor of London shows that unmet need arising from London will compound existing and future shortfalls in adjacent authorities. This further justifies the need for a comprehensive and holistic approach between neighbouring authorities to deal with the strategic cross-boundary issue.</p> <p>Conclusion</p> <p>1.18 The DTC Statement is intended to demonstrate that the statutory Duty has been met. However DTC Statement lacks any commitment to a comprehensive and holistic review of Local Plans within the West Sussex HMA, with each authority proceeding with plans that do not give proper consideration to the housing pressures across the HMA and beyond.</p> <p>1.19 This is demonstrated in paragraph 31 of the DTC Statement which refers to "ongoing" discussions and future decisions that will need to be made in the context of cross-boundary strategies to respond to unmet need. Paragraph 31 states:</p> <p>"Ongoing discussions are necessary between Crawley and its adjoining authorities, in relation to the potential for further urban extensions to the borough, in particular to assess any new evidence in relation to infrastructure capacity and environmental</p>	

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			<p>constraints, and whether such development would constitute the most appropriate longer term sustainable location for strategic development in the context of the development strategies of the Local Plans for the adjoining authorities, in light of the wider housing pressures from coastal authorities and Surrey /London.”</p> <p>1.20 The lack of constructive cooperation, resulting in clear outputs and policies/strategies renders the Crawley Local Plan unsound as it has failed to meet its statutory obligations under the Duty to Cooperate. By implication the housing requirement which needs to be accommodated is clearly significantly in excess of what the respective Plan plans provide for. To date the neighbouring authorities have failed to take the opportunity to align their strategic plans to provide a holistic approach to address strategic issues across administrative boundaries. It is unacceptable to perpetuate this failure to cooperate on strategic matters by deferring this process to some unknown period in the future as part some strategic review of Local Plans.</p>	
REP/061 CSC2055748	Surrey County Council		<p>Thank you for consulting the County Council on the above. Previously the County Council have responded to consultations to consistently express concern about the potential impact of growth on infrastructure provision within adjacent Surrey Districts, particularly regarding the possible impact which development in Crawley could have on the transport network in Surrey.</p> <p>We are pleased to see that our previous comments have been noted in the appendices to your consultation statement (2013) and that they have been taken forward to this submission document.</p> <p>The only comment we would add is that in order for the Local Plan to be effective and therefore sound, it is important that it is made clear that future transport assessments relating to the key development sites and employment opportunity areas examine the impacts on the transport network in adjoining local authority areas and, if these are forecast to be significant, then transport and highway improvements to mitigate these impacts will be agreed with those authorities, including Surrey County Council, and will need to be funded from developer contributions.</p>	
REP/039 (CSC2056475)	Mid Sussex District Council	DTC	<p>Crawley Borough Local Plan 2015 – 2030</p> <p>Thank you for your letter to Claire Tester of 29th August to invite us to make representations on your proposed submission Local Plan.</p> <p>We are happy to support your Local Plan and would be pleased to continue to cooperate proactively and in partnership with your Council as we prepare our own revised District Plan for intended submission to the Secretary of State next year.</p>	

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REP/006 (CSC2055755)	Mr. Julian Goodban Bellway Homes Limited (South East Division)	DTC	<p>These submissions are made on behalf of Bellway Homes Ltd (South East Division). By virtue of Section 110 of the Localism Act 2011, the Council has a 'duty to co-operate' in relation to the 'planning of sustainable development' whereby local planning authorities, county councils and a number of other public bodies are obliged to cooperate to maximise the effectiveness of development plan documents where they relate to strategic matters.</p> <p>A 'strategic matter' is defined at section 110 (4) as:</p> <p>(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and</p> <p>(b) sustainable development or use of land in a two-tier area if the development or use—</p> <p>(i) is a county matter, or</p> <p>(ii) has or would have a significant impact on a county matter.</p> <p>The NPPF sets out strategic priorities in paragraph 156 which should be provided for through strategic Local Plan policies, such as the Crawley Local Plan. These cover a range of topics including homes and jobs, health and community infrastructure, retail, leisure and transport infrastructure. The NPPF highlights the duty to cooperate on cross-boundary planning issues and the importance of collaborative working to ensure that strategic priorities are properly coordinated and development requirements can be met (paragraph 179). Moreover, the NPPF requires local planning authorities to take account of different geographic areas, including travel to work areas, to facilitate the delivery of sustainable development (paragraph 180).</p> <p>Indeed:</p> <p>"The Government expects joint working on areas of common interest to be diligently undertaken for the benefit of neighbouring authorities". (paragraph 178)</p> <p>In setting its proposed housing requirements for the Borough, the Council ought to have had regard to a range of documents and evidence. It has sought to identify its locally generated housing requirements. The SHMA was undertaken on a joint basis with neighbouring boroughs and districts, reflecting the operation of the housing market area, which extends to include neighbouring districts such as Horsham and Mid Sussex.</p> <p>Through the Submission draft, Crawley has maintained its approach of a capacity based (or as it states a supply based) approach. Policy H1 of the emerging plan identifies a need for 4,895 net dwellings in the period 2015-2030, with an annualised target of 326 per annum.</p> <p>We make no comment upon the proposed components of supply, other than the Council appears to be placing significant reliance upon the NE Sector</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>neighbourhood (Forge Wood) in the first 10 years. Any delay in delivery will have a significant impact upon 5 year supply.</p> <p>The shortfall of 3,130 is to be met elsewhere in the NW Sussex and Surrey SHMA area:</p> <p>“The constrained nature of Crawley’s land supply means that 60% of the borough’s predicted demographic housing need over the next 15 years can be met within the borough boundaries. The remaining unmet housing need from Crawley, of 3,130 over the Plan period, will be delivered through the Local/District Plans covering the remainder of the northern West Sussex and East Surrey Housing Market Areas, as far as is consistent with planning policies to do so, as agreed through the northern West Sussex Position Statement with Horsham and Mid Sussex District Councils and the Statement of Common Ground on meeting strategic housing needs with Reigate and Banstead Borough Council” (para 6.40).</p> <p>In terms of justification and discharge of the Duty to Cooperate, the Northern West Sussex Position Statement (July 2014) was signed by Crawley, Horsham and Mid Sussex and states:</p> <p>“The three authorities recognise that, across the North West Sussex housing market area as a whole, the local plans they are producing will not fully meet objectively assessed housing needs, a shortfall generated primarily from within Crawley where a variety of constraints dictate a capacity-led approach to meeting housing needs. Each authority has assessed the ability of its area to accommodate further housing development in the light of this shortfall. They each consider that they are doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, and the need for sustainable development.” (para 6.16)</p> <p>In short it is an agreement of the position, but nothing tangible has been agreed in terms of solutions. None of the authorities are meeting their own objectively assessed housing need. In terms of Crawleys shortfall, this is accepted but there is no formal agreement as to how it is to be addressed either spatially or in terms of unit numbers.</p> <p>In terms of the Reigate Statement of Common Ground, again this reads as an agreed ‘state of play’ and intention to continue to co-operate. In short both documents read as an agreement to ‘do nothing’.</p> <p>There is clearly an absence of co-operation as requirement by section 110 of the Act and paragraphs 178 to 181 of the NPPF.</p> <p>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 justified nor consistent with national policy (see para 182 of the NPPF).</p>	

Key Diagram

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/055 (CSC2055721)	T&L Crawley LLP		Key Diagram/Proposals Map For clarity, and to accurately reflect the County Oak area's retail function and the recommendations of the evidence base documents, we request that the Key Diagram and Proposals Map should identify the County Oak retail area, including the Betts Way site	
REP/072 (CSC2055889)	Wilky Group Simon Fife (Savills)		PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS	PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS
REP/013 (CSC2055701)	Crest Strategic Projects Savills		PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION

Crawley 2030 Vision

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/013 (CSC2055701)	Crest Strategic Projects		PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency		<p>The HA is broadly supportive of the Crawley 2030 Vision, particularly, "Growth will be sustainable and supported by an infrastructure plan that complements development... A strong road network will be complemented by a good public transport system, giving people choice about how they travel."</p> <p>We request that consideration is given to the specific capacity requirements for any SRN improvements required in order to demonstrate that they mitigate the transport impacts of Local Plan development. This should also cover funding and the delivery of these improvements, in accordance with the requirements of the National Planning Policy Framework (DCLG, 2012). The HA request to be consulted at the earliest opportunity with regard to the Infrastructure Delivery Plan in order to ensure that the Local Plan is deliverable.</p>	
REP/062 (CSC2055844)	Sussex Police		In terms of the Submission Local Plan, Objective 3 which aims to achieve the vision of the Plan is particularly welcomed as this seeks "To reduce crime and fear of crime in Crawley through protecting and improving community safety in the borough." It is agreed that this objective is sound and based upon principles enshrined in the National Planning Policy Framework 2012; is a strategic issue in the Duty to Cooperate; and a clear priority for Crawley Borough Council, as set out in the Corporate Plan.	

Spatial Context

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/052 (CSC2055353)	Mr. Nicholas Price	ALL Local Plan	NONE AT PRESENT	None at Present
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Village Conservation Area Advisory Committee)	ALL Local Plan	<p>This comment refers to the whole plan, not to a specific policy. We do not argue with much of the Local Plan. It appears to have done a comprehensive job of assembling the evidence base and laying out the facts about Crawley's current situation. It also (with the notable exception of the topic of the expansion of Gatwick Airport) does an apparently comprehensive job of drafting policies to address Crawley's needs. In fact in other submissions Ifield Village Association has supported specific policies that will enhance the town.</p> <p>However the plan does not address adequately the fact that a second runway built at Gatwick would make the vision of 2030 (para 2.13) unattainable. There appears be no 'plan B' should the government decide to put an additional runway at Gatwick. It is on this specific ground that we regard the plan as unsound. The document admits that the plan only refers to the airport not being extended (para 1.38), but does not argue that the Local Plan would be unachievable should the airport be expanded.</p> <p>It lacks the coherent overview that one would expect from a Plan. a. The need for a coherent overview Section 2 (pp 13 - 19) lays out the evidence for the challenges that Crawley faces based on its evidence base. It does not, however, summarise the key features which would help to give a concise coherent overview.</p> <p>It needs to be stated more clearly that: The Borough of Crawley is a fairly unusual place. Its key features could be summarised thus: 1. Crawley is constrained tightly within its boundaries with very little room for further building. 2. Crawley has a shortage of housing to meet the needs of its present residents. 3. There is a particular shortage of affordable housing. 4. Crawley's industries generate more jobs than are needed by its residents. 5. The surrounding authorities supply workers for Crawley, leading to a large net inflow of commuters. 6. Crawley roads are severely congested during the morning and evening commuting periods.</p>	<p>Summary of Unique features It would be possible to use the format above to give a summary, but it is also possible to roll these into paragraphs, by adding the following at the end of the section on Spatial Context in Chapter 2 i.e. after 2.31 on page 13. This addition would involve the renumbering of paragraphs in the following section of the Plan.</p> <p>"Summary - Spatial context and its implication The evidence outlined in this section leads to a picture of Crawley as an unusual place. It is a town that is constrained within its boundaries with little space for further building. It has a shortage of housing for its present population, especially for those requiring affordable housing. It generates more jobs than are needed by its population, and hence has a net inflow of workers.</p> <p>This causes congestion on the roads, both in and around the town, at commuting periods in the morning and evening. Gatwick Airport is the largest employer in the town, supplying a high proportion of low-paid jobs.</p> <p>There are two implications of this scenario. First, Crawley's surplus of jobs, deficit of housing, constrained boundaries and dependence on workers from surrounding areas are responsible for heavy commuting and consequent road congestion. Second, Crawley's shortage of affordable housing is exacerbated by the large proportion of low-paid jobs generated by Gatwick Airport. This is already causing distress among</p>

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			<p>7. Gatwick Airport is the largest single employer, generating a large proportion of lower-paid jobs.</p> <p>The implications of the above features are obvious: 1. Crawley's surplus of jobs (4) deficit of housing (2) constrained boundaries (1) and dependence on workers from surrounding areas (5) are responsible for heavy commuting and consequent road congestion (6) 2. Crawley's shortage of affordable housing (3) is exacerbated by the large proportion of low-paid jobs generated by Gatwick Airport (7). This is already causing distress among those subject to the 'bedroom tax' and among those waiting for social housing. b. The influence of Gatwick Expansion. There is a serious gap in the Plan - the Council has failed to take a position on a second runway at Gatwick. It voted to wait for further information before making a decision. However, the draft Plan contains all the evidence needed to make this decision: it is obvious that a second runway would make all of the above problems worse. A second runway at Gatwick would: 1. build on the 'safeguarded' land, remove the green buffer between the town and the airport and remove any possibility of building further housing north of Pound Hill; 2. greatly increase inward commuting; 3. cause severe noise disruption to the northern parts of the town; 4. create further pressure on transport links, both within the town and between the town and London; 5. increase Gatwick's dominant position as the main employer; 6. add to the proportion of low-paid jobs and the demand for affordable housing; c. Conclusion</p> <ul style="list-style-type: none"> • The Plan should include a summary of the unique features of Crawley Borough. • The Plan should include a summary of the problems arising from those unique features. • The Plan should include a coherent strategy for addressing those problems. • The Plan is worthless while it fails to take a position on the largest issue to face Crawley in a generation: expansion of Gatwick Airport. • A decision against a second runway at Gatwick should be taken now and the Plan updated to include that decision. 	<p>those subject to the '#bedroom tax' and among those waiting for social housing."</p> <p>Add the following policy and reasoned justification in chapter 9 to address the impact of a second runway. "Policy GAT5: Impact of a second runway While respecting its duty to co-operate CBC will take every opportunity offered in consultations to argue against the development of a second runway at Gatwick.</p> <p>Reasoned Justification A second runway at Gatwick would build on the 'safeguarded' land, remove the green buffer between the town and the airport and remove any possibility of building further housing north of Pound Hill. It would greatly increase inward commuting, cause severe noise disruption to the northern parts of the town and create further pressure on transport links, both within the town and between the town and London. It would increase Gatwick's dominant position as the main employer; and add to the proportion of low-paid jobs and the demand for affordable housing. Urbanisation of the surrounding countryside would occur. Crawley could no longer be described as 'a town in the countryside', i.e. its policies referred to in paragraph 2.11 would no longer be effective. Crawley would be unable to achieve its vision of 2030 if a second runway were built."</p>
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	ALL Local Plan	Overall we are pleased that the matters of interest to have been addressed appropriately within this document and we consider the document 'Sound' subject to some minor amendments for clarification purposes.	
REP/012 (CSC2055687)	Bupa Care Services		<p>Concluding Comments</p> <p>In general we have serious concerns regarding the robustness of the evidence base that has been used to determine policies in the DLP, particularly in relation to housing. It is clear that the Council are not adequately planning on meeting OAN.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>They have also failed in their duty to cooperate, which is essential when identifying the baseline for OAN.</p> <p>On this basis we consider that housing need is significantly in excess of planned targets in Policy H1.</p> <p>We also have concerns regarding the decision making process to remove Oakhurst Grange as a key housing site from Policy H2.</p> <p>On the basis of our review of the housing evidence base it is clear that the Council need to consider robustly and positively every available site for housing, especially when there is no clearly identifiable need for it to be retained in a different use.</p> <p>Furthermore, the decision to remove Oakhurst from this policy appear not to be based on sound evidence and need.</p> <p>Finally, with regard to policy H4, we consider that the currently drafted affordable housing and low cost housing requirements are overly onerous, will further stagnate delivery and lead to a situation of planning by appeal.</p> <p>In general we consider that significant further work is required to make fundamental elements of this document sound and legally compliant.</p> <p>Please take all of the comments raised in this written representation fully into account in the next stages of the Local Plan.</p>	
REP/049 (CSC2055743)	Mr. James Walton Network Rail	General	In conclusion, I confirm that Network Rail is supportive of the aims and principles of the emerging Crawley Borough Local Plan 2015-2030 and would like to see the issues raised in our response to this consultation put to the top of the council's agenda, as such we would like to work closely with Crawley District Council to facilitate dealing with the issues raised in our response.	
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council		<p>INTRODUCTION</p> <p>The Submission Consultation draft of the Crawley 2030 Local Plan sets out how Crawley Borough Council (CBC) will plan for future development up to the 2030 end date of the Plan period. Following the current period for representations (Regulation 19 of the 2012 Town & Country Planning Regulations) CBC is intending to formally submit the Crawley 2030 Local Plan to the Secretary of State in late Autumn 2014. A public examination by an independent Planning Inspector is expected to be held in Spring 2015.</p> <p>West Sussex County Council officers have considered the Crawley 2030 Local Plan Submission Consultation draft, the Local Plan Map and the Sustainability Appraisal/Strategic Environmental Assessment. This note sets out officer comments upon these documents, highlighting key issues and suggesting changes which the</p>	

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			<p>County Council is requesting be made to the Crawley 2030 Local Plan prior to its adoption by Crawley Borough Council.</p> <p>GENERAL COMMENTS WSSC Minerals and Waste Policy comments Crawley Borough Council has carried out engagement with the County Council in respect of strategic mineral and waste issues. The comments submitted by the County Council here reflect the agreements between officers of both Authorities which, due to time constraints, have not been reflected in the published version of the Crawley 2030 Local Plan.</p> <p>Mineral safeguarding The adopted West Sussex Minerals Local Plan (2003) safeguards three mineral railhead sites in Crawley at Tinsley Lane, near Three Bridges. The adopted Plan, through Policy 37, safeguards such sites from other forms of development to ensure adequate facilities for the transportation of minerals by rail are available. This includes impacts of other development at neighbour sites, which may give rise to complaint regarding the nature and operation of the safeguarded sites. These sites are critical to the movement of aggregates into and out of the County, and particularly important in relation to the supply of aggregates such as crushed rock which is not available indigenously. The availability of minerals is key to the development of housing and infrastructure as well as the economy.</p> <p>The County Council is working to prepare a new Minerals Local Plan (MLP) for West Sussex in partnership with the South Downs National Park Authority. Early engagement and evidence gathering confirmed the strategic importance of the safeguarded railhead sites. In line with national planning policy, the new Plan will continue to recognise this important infrastructure through safeguarding and the possible identification of a Mineral Consultation Area.</p> <p>The County Council requires that the safeguarded mineral sites be reflected on the Crawley Local Plan Policies Map prior to adoption of the Plan. Minerals Consultation Areas should also be shown on the Policies Maps across the County and we suggest these are identified to be included in the future. The County Council would also support the inclusion of a reference in the Crawley Local Plan to confirm the safeguarded status of the mineral sites. This could usefully link to the proposed allocation for mixed use recreation/residential at Tinsley Lane, to confirm that prospective developers must have regard to impacts on the safeguarded sites in preparing their scheme and planning application.</p> <p>Transport Evidence Base The County Council supports the study work commissioned by CBC to assess the impacts of the proposed development allocations and establish that those impacts</p>	

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			can be mitigated. The Crawley Local Plan Transport Strategy completed in November 2013 showed that, with appropriate mitigation measures in place, the development proposed in the Crawley 2030 Local Plan is capable of being delivered without unacceptable impacts on the County highway network.	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited		<p>Please see attached full representation including cover letter.</p> <p>Gatwick Airport Limited (GAL) welcomes the opportunity to comment on the Crawley Submission Local Plan Crawley 2030 ('the Plan') as part of the current Public Consultation. GAL offers its representation on the Plan's policies and supporting text as is considered appropriate at this stage in the public engagement process. The representations cover the following matters:</p> <p>Policy</p> <p>GAT1: Development of the Airport with a Single Runway</p> <p>GAT2: Safeguarded Land</p> <p>GAT3: Gatwick Airport Related Parking</p> <p>GAT4: Employment Uses at Gatwick</p> <p>EC2: Economic Growth</p> <p>ENV10: Pollution Management and Land Contamination</p> <p>ENV11: Noise Sensitive Development (and Noise Annex)</p> <p>ENV12: Air Quality</p> <p>H5 : Gypsy, Traveller & Travelling Showpeople Sites</p> <p>HC1: Housing Provision</p> <p>HC2: Key Housing Sites</p> <p>IN1: Infrastructure Provision</p> <p>IN6 : Rail improvements</p> <p>SD1: Sustainable Development</p> <p>These submissions also provide general overarching comments on the Plan which we consider to be of specific relevance and importance. The representations put forward by GAL are on the basis of the Plan, in the opinion of GAL , being in parts 'unsound' in planning terms due to the policies proposed and justification supporting such policies.</p> <p>In the absence of further modifications to the draft Local Plan GAL will participate at the forthcoming Examination in Public in 2015 where the further evidence base for GAL's representation can be presented in detail.</p> <p>Local Plans are required to be sufficiently flexible to be able to accommodate needs not anticipated in the plan and to allow a rapid response to changes in circumstances (NPPF paragraphs 14 and 22).</p> <p>With the on-going issues relating to the potential for a second runway and associated infrastructure to come forward at Gatwick, this means that the Plan will have to</p>	See attached full rep and detailed comments on specific policies.

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			<p>demonstrate that it is sufficiently flexible to be able to respond to the changes that will arise if this expansion of Gatwick were to come forward during the lifetime of the Plan.</p> <p>The potential expansion of Gatwick has significant ramifications for the Borough in planning terms and for the draft Local Plan given that the delivery of a potential new runway at Gatwick is proposed to occur within the lifetime of the Plan.</p> <p>We recognise that the Plan can only address the existing situation of the airport operation with its single runway and two terminal configurations. It is, however, important for the plan to be prepared taking into account the ongoing work of the Airports Commission regarding the potential for a second runway to be located at Gatwick in the future. This forms a significant material consideration that has direct implications for the Plan given the delivery of a potential new runway at Gatwick within the lifetime of the Plan. Thus uncertainty surrounding future airport expansion makes the task of producing a sound Local Plan difficult. GAL acknowledges that uncertainty surrounding the future of the airport growth has been recognised in some areas of the Plan. We support the position that the Plan would need to be subject to a major policy review pending the recommendations of the Airport Commission and any subsequent policy announcement by Government which is due in 2015. GAL broadly agrees with the three possible scenarios surrounding the airport and future development that CBC have specifically highlighted in paragraphs 1.39 - 1.43 of the Plan which would form the basis of a policy review.</p> <p>GAL's representation and comments on the Plan are therefore made on an assumption that the draft Plan is intended to address a scenario going forward that does not involve an additional runway and associated infrastructure; rather a new Local Plan would be promulgated in this event.</p> <p>However the draft Plan does need to recognise that the Airports Commission has included Gatwick on its shortlist of potential locations for a new runway in the UK. The potential for Gatwick to develop a twin runway configuration must be clearly highlighted within the Submission Plan. We believe it is important that the triggers for how and when a new Local Plan would come forward are set out within the Plan and reiterated in the supporting text of the policies. We consider such an approach is a fundamental requirement to ensure that the flexibility required by the NPPF is provided and that the Plan is sound.</p> <p>We look forward to discussing these representations with Crawley Borough Council.</p>	
REP/041 CSC2055772	Mr. Colin Maughan	ALL Local Plan	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency		<p>The Local Plan notes that Crawley has excellent transport links, including the M23 and M25. This part of the strategic road network is currently under stress and the junctions are particularly congested, especially at peak times.</p> <p>The HA wishes to see proposed housing and employment sites related to other proposed development in neighbouring authorities, with demonstrable evidence that the road infrastructure has been planned, even in outline, to cater for the total amount of development. The HA would require improvements to the relevant strategic road network junctions to accommodate residual development traffic, after all other sustainable transport means have been implemented.</p>	
REP/008 (CSC2055883)	Mr. Graham Berry	General	1) The document could have been reduced by 50>75% to much wording !! No detail When I attended WSCC and borough forward meeting much more detail was given. So why can't it Now? I suspect too much time taken wasting tax payers money	
REP/013 (CSC2055701)	Crest Strategic Projects Savills		PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/035 (CSC2054885)	Mr Peter Jordan		<p>1. I strongly approve of the designation of Ifield Brooks Meadows and Rusper Rd playing field as a Local Green Space (ENV3). This beautiful and tranquil area is easily accessible from residential areas and is well used as a recreational area by walkers. It is accessible at several points from the Ifield Village Conservation Area and is particularly suitable for circular walks.</p> <p>2. The draft plan as a whole fails to demonstrate a strategy to address Crawley's problems. The problems are listed (surplus of jobs, shortage of housing, inward commuting of workers from neighbouring authorities, congested roads, lack of opportunity to build additional housing, etc.) However, although all these factors are mentioned, there is no overall strategy which addresses them as a whole or proposes a coherent approach.</p> <p>3. The plan is grossly deficient in failing to address the proposed expansion of Gatwick Airport. Because the council has opted for a "wait and see" position, the Plan is unable to say anything worthwhile about Gatwick Airport. This makes the Plan useless for the period up to 2030, as any decision on Gatwick will render it out of date.</p> <p>4. Crawley's problems mentioned in 2 would all be made worse by a second runway. The council should recognise this (since the Plan demonstrates that the evidence is already available) and vote against an expansion which would be in nobody's interests except Gatwick Airport Limited and its shareholders.</p>	<p>Take a position against a second runway at Gatwick. Add a strategic summary to the plan so that it lists Crawley's main problems and proposes a coherent strategy to address them.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/054 (CSC2055476)	Reigate and Banstead Borough Council		<p>its objectively assessed housing needs, and can confirm that CBC have engaged with Reigate & Banstead in respect of this issue. Whilst we do not consider the plan itself to be unsound, we have some comments about the evidence base.</p> <p>Local Housing Market Areas: Reigate & Banstead falls within the East Surrey Housing Market Area, although the presence of London 'on the doorstep' has an impact on movements across the wider area. This is confirmed by work by DCLG which suggests that the borough falls within the wider London HMA and the local London (South West) HMA: the Crawley HMA sits to the south of Reigate & Banstead Borough, although there are some localised movements between the southern part of the borough and Crawley.</p> <p>Housing supply in Reigate & Banstead: The Reigate & Banstead Core Strategy was examined in 2013. At the examination it was recognised that, whilst the borough was able to provide sufficient housing to meet the full need arising from within the local population, it was not able to fully meet its objectively assessed housing needs taking into account immigration pressures (even allowing for release of Green Belt land for development). As such RBBC is committed to working closely with other authorities (including those within the East Surrey HMA and North West Sussex HMA) to understand the extent to which housing needs across the area can be met and to secure the delivery of much needed new homes.</p> <p>Migration into RBBC: Cooperation between RBBC and CBC resulted in clarification in our Core Strategy that our housing figure does allow for some continuing immigration from other local authorities, including those within East Surrey and North West Sussex. Our Core Strategy does not however, make specific (quantified) allowances for immigration from individual boroughs. This is due to the complexities of the housing market area for Reigate & Banstead and the inability to control where those who purchase market housing in the borough originate from. We note the figure of 50 dwellings per year identified in the Unmet Needs Topic Paper, however this is not derived from our own policy or evidence base.</p>	<p>Whilst we do not seek changes to the Local Plan as submitted, we would not support the inclusion of a quantified proportion of the Reigate & Banstead housing target 'allocated' to meet Crawley's needs as in reality this would not be achievable, and the suggested figure may not be realistic taking into account migration pressures into Reigate & Banstead from, for example, London.</p>
REP/083 (CSC2052540)	Mr Arshad Khan		<p>Crawley Council are incompetent. Council have failed Crawley. Crawley have been turned into Concrete Jungle. 100 trees are cut down to make room for 2 house. When new trees are planted, the trees are not watered & they die. New houses are built too close to each other. This practice is disasterous, this is building of shanty town.</p> <p>Plan is disaster for crawley, new street will be too narrow, it will cause accident. Emergency vehicles will not be able to get to victims. New plan will cause suffering to</p>	<p>Crawley is full, every little green space have been built on. 700,000 immigrants from Eastern Europe & rest of the world come to Britain each year.....</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>residents, it will lead to accidents on the roads & public will be hit by vehicles walking on the pavements. There is no public transport for public to get around.....</p> <p>This is illegal plan, it must not go ahead</p>	

Sustainable Development

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Ltd.	SD1	<p>Background: Gatwick Airport is the UK's second largest airport and the most efficient single-runway airport in the world. It serves more destinations than any other UK Airport connecting to more than 200 destinations in 90 countries and currently serves more than 37.5 million passengers a year on short and long-haul point-to-point services. These levels of operation are predicted to grow irrespective of the development of a second runway. Gatwick is a major economic driver for the region and therefore has a significant influence upon not only Crawley, but also the wider London and South East Region as it contributes around £2 billion annually to the economy of London and the sub region. Further Gatwick is the single largest local employer generating over 21,000 on-airport jobs and a further 20,000 jobs through related activities. The airport is 28 miles south of London with excellent public transport links, including the Gatwick Express. Gatwick Airport is recognised as an industry leader in Sustainability. The Airport is owned by a group of international investment funds, of which Global Infrastructure Partners (GAL) is the largest shareholder.</p> <p>This Representation sets out GALs overarching views of the proposed Submission Plan and considers the soundness of specific planning policies proposed within the draft Plan in further detail. The Representation also presents GALs recommendations for specific amendments to the proposed text of the Plan's policies and supporting text, which it considers are necessary to make the Plan sound.</p> <p>In the event that the point raised in this Representation are not sufficient addressed, GAL will wish to participate in the Local Plan Examination which is to come.</p> <p>GAL welcomes and supports policies within the Plan that are aimed at facilitating the sustainable growth of Gatwick Airport in its current form as a one runway, two terminal airport and to a passenger throughput of 45mppa by 2030. GAL supports overall the policies promoted in GAT1 and the overarching positive theme of Policy SD1 to deliver sustainable development of the airport on a proactive basis.</p> <p>GAL believe however that it is material to the consideration of the Plan to highlight that in its December 2013 interim report, the Airports Commission included Gatwick on its shortlist of potential locations for a new runway in the UK. GAL recognises that the Plan can only promote policies applicable to the airport in its current layout as a single runway operation. However , in order to provide sufficient flexibility to be sound, GAL believes that the future potential for Gatwick to develop a twin runway configuration does need to be clearly highlighted within the Plan along with further detail supporting text in para 9.18 to clarify the triggers for how and when the a Local Plan Review is proposed. We welcome the approach for a Plan Review if required. We consider this</p>	<p>We believe the policy supporting text para 3.3 is appropriate but should include the following text: "in areas outside of the land currently safeguarded for a possible second runway and that is not subject to unacceptable levels of noise nuisance"</p> <p>Para 3.4 also needs to reflect this point and we therefore suggest the supporting text inclusion; "whilst maintaining the quality of the development, the development viability, its usage and not unduly impacting upon amenity of the development site"</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>inclusion to be imperative to securing a Plan that is sound and given the strong likelihood of the prospects for Gatwick Airport to become a two runway airport during the lifetime of the Plan. GAL recognises this issue has been previously identified within a Local Plan Topic Paper and referred to in the Foreword Chapter; but we believe this now needs to be strengthened, made clearer and integrated within the actual text of the Local Plan document rather than within the separate Monitoring Report.</p> <p>Policy SD1 Sustainable Development GAL supports the adoption of Policy SD1 in recognition of the requirements of the NPPF and the Presumption in favour of sustainable development. We believe this to be a proactive position that will enable sustainable forms of development to come forward, and that will promote more certainty for local businesses in order to facilitate the greater economic activity and thus growth within the Borough.</p>	
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	SD1	The HA is broadly supportive of the principles of Policy SD1 which are consistent with the NPPF. However...	<p>...we would recommend an additional point within objective 2 which seeks to ensure that the location of development can effectively mitigate its impact on the local and SRN as follows:</p> <p>Scope for mitigating the impact of development on the local and strategic road network.</p>

Character

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	ALL	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area. Outside the Ifield Village Conservation Area, the designation of the 'Arts and Crafts' houses in Rusper Rd as an Area of Special Local Character (CH14) is welcomed. These houses continue into the Horsham section of the Rusper Rd. It would be good to see a Horsham District Council policy which was similar to the Crawley one. We strongly support CH10 the protection of the High Weald ANOB.	
REP/076 (CSC2055267)	Mrs. Jennifer Grace Withall	CH1	After viewing the plans for Tilgate and the possibility of 100 more dwellings, I would draw your attention to homes for sale and in particular for elderly people looking for ground floor access. The other idea would be for stair lifts or lifts to other floors. There are very few of these type of properties to buy in Tilgate at present. Many thanks	
REP/035 (CSC2054885)	Mr. Peter Jordan	CH2	1. I strongly approve of the designation of Ifield Brooks Meadows and Rusper Rd playing field as a Local Green Space (ENV3). This beautiful and tranquil area is easily accessible from residential areas and is well used as a recreational area by walkers. It is accessible at several points from the Ifield Village Conservation Area and is particularly suitable for circular walks. 2. The draft plan as a whole fails to demonstrate a strategy to address Crawley's problems. The problems are listed (surplus of jobs, shortage of housing, inward commuting of workers from neighbouring authorities, congested roads, lack of opportunity to build additional housing, etc.) However, although all these factors are mentioned, there is no overall strategy which addresses them as a whole or proposes a coherent approach. 3. The plan is grossly deficient in failing to address the proposed expansion of Gatwick Airport. Because the council has opted for a "wait and see" position, the Plan is unable to say anything worthwhile about Gatwick Airport. This makes the Plan useless for the period up to 2030, as any decision on Gatwick will render it out of date. 4. Crawley's problems mentioned in 2 would all be made worse by a second runway. The council should recognise this (since the Plan demonstrates that the evidence is already available) and vote against an expansion which would be in nobody's interests except Gatwick Airport Limited and its shareholders.	Take a position against a second runway at Gatwick. Add a strategic summary to the plan so that it lists Crawley's main problems and proposes a coherent strategy to address them.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	CH2	The policy should be positively prepared so as to achieve sustainable development. The policy should not, however, seek to overly restrict and control development proposals.	The policy should be applied flexibly to allow proposals to come forward in a way which allows them to respond most effectively to their site context.
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	CH2	Policy CH2 - Good Design GAL welcomes this Policy as we consider it promotes sustainable development through the adoption of best planning practice and sustainable developments. We particularly support points (f) & (g) of Policy CH2 which offer the flexibility and 'future proofing' for development particularly as technological advancements come forward. Such advancements now clearly shape spatial planning and it is important to respond to them in the Local Plan in order to reflect the changing needs of communities and mixed use development and to drive economic activity and growth.	
REP/060 (CSC2052787)	Mr. Laurence Skinner	CH3	Traffic calming should be implemented by designing curves into roads not by use of humps, chicanes or pinch points as these aggravate drivers, damage vehicles and increase pollution.	
REP/055 (CSC2055721)	T&L Crawley LLP	CH3	Policy CH3 – Normal Requirements for All New Development Criterion b) requires a future management and maintenance plan for all shared hard soft landscaping, semi public or semi-private areas as part of a planning application. We object to this requirement, as it is considered to be unnecessary and onerous, as these are detailed development management matters, and can adequately be secured by way of planning conditions. Additionally, we object to the blanket approach to seeking contributions towards streetscene improvements, public art and CCTV. The NPPG clearly advises that planning obligations should not be sought - on for instance, public art – which are clearly note necessary to make a development acceptable in planning terms. Furthermore, the NPPG states that a planning obligation can only be taken into account in the determination of a planning application, if the obligation is directly related to the development, and fairly and reasonably related in scale and kind to the development. We therefore consider that criterion b) is unsound, and the second and third sentences should be amended.	Suggested amendments to Policy CH3 criterion b): “Proposals must be supported by a future management and maintenance plan for all shared hard and soft landscaping, semi public or semi private areas to ensure these areas become well-established. Where necessary and justified, contributions towards streetscene improvements, public art and CCTV will be sought in accordance with Council guidance.” We object to the last paragraph of Policy CH3, as it adopts an incorrect approach to supplementary planning guidance produced by the Council by requiring that development proposals “must adhere” to any relevant Supplementary Planning guidance. As the NPPF defines, supplementary planning documents (SPD) are not part of the development plan, and are a material

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>consideration in planning decisions as they can be used to provide future guidance for development on specific sites. It should also be noted that SPDs are not intended to be prescriptive, but are a guide. To reflect the status of supplementary planning documents, this paragraph should be amended.</p> <p>Suggested amendments to the last paragraph of Policy CH3:</p> <p>“Where appropriate, development proposals must adhere should have regard to any relevant supplementary planning guidance produced by the Council including residential extensions...</p>
REP/048 (CSC2055764)	Mr. John Lister Natural England	CH3	I note that there are allocations such as Forge Wood, Pound Hill and Desmond Anderson, Tilgate; that either include or adjoin sensitive habitats, and trust that Policy CH3 will be effective in ensuring that these sorts of assets are protected and enhanced at the detailed planning stage and that where appropriate a planning/design and environmental brief is prepared prior to detailed application.	None suggested.
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	CH3	Point C of Policy CH3 states, “All proposals for new development in Crawley will be required to not cause unreasonable harm to the amenity of the surrounding area by way of overlooking, dominance or overshadowing, traffic generation” The HA request that the point is clarified as the use of the term ‘unreasonable harm’ may be unclear. The Infrastructure Delivery Plan should demonstrate that all new Local Plan development impacts should be fully deliverable and mitigation provided if/ where required.	For development outside of the Local Plan development proposals should be supported, where appropriate, with a Transport Assessment and Travel Plan. These documents should set out how transport infrastructure arising from the expected demand will be provided. We would also recommend that reference is made to showing how infrastructure may be funded and delivered.
REP/003 (CSC2055473)	Mr James Mclean Aberdeen Investments	CH3	The policy should be positively prepared so as to achieve sustainable development. The policy should not, however, seek to overly restrict and control development proposals.	The policy should be applied flexibly to allow proposals to come forward in a way which allows them to respond most effectively to their site context.
REP/003 (CSC2055473)	Mr James Mclean Aberdeen Investments	CH4	We support this policy but consider that in order to be effective, it should encourage development proposals to optimise the potential of sites.	The policy should be applied flexibly to allow proposals to come forward in a way which allows them to respond most effectively to their site context.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/050 (CSC2055768)	Persimmon Homes and Taylor Wimpey Ltd.	CH5	<p>Policy CH5: Standards for All New Dwellings (including conversions)</p> <p>Policy CH5 is considered to be overly prescriptive and unsound as it does not reflect the direction of travel in terms of national policy in respect of new national housing standards.</p> <p>Through the 'Housing Standards Review' the Government intends to set out a national space standard which would cover the internal area of new homes. As such the specific requirements identified by Policy CH5 are considered to be unnecessary and conflict with the clear emphasis placed on a single national standard sought through the Housing Standard Review.</p> <p>The basis for the Standards Review is to simplify the process by having a single standard in place, rather than the current system of housing standards which can vary considerable between local planning authorities. New national standards will result in the removal of existing standards such as those set out in the Code for Sustainable Homes, Lifetime Homes and Secure by Design.</p> <p>Consequently Policy CH5 is premised on standards which are due to be made obsolete and it should therefore be deleted.</p> <p>If it is the intention to proceed ahead with the targets notwithstanding the comments set out above, it is considered that there should be an opportunity for further public consultation which includes details of how they have been tested in terms of viability in conjunction with all other standards that are to be imposed.</p> <p>The standards could impact considerably on the viability of schemes, reduce dwelling numbers and result in standardised development that fails to create attractive and distinctive residential environments.</p> <p>Any such standard must therefore include an element of flexibility to allow for site specific circumstances to prevail. This should also enable the standards to be used as a guide for creating suitable living environments (against which individual proposals can be assessed) rather than a rigid and prescriptive rule.</p>	
REP/003 (CSC2055473)	Mr James Mclean Aberdeen Investments	CH5	Residential space standards should be applied flexibly and with regard to viability so as not to unduly inhibit the development potential of sites.	The policy should be applied flexibly to allow proposals to come forward in a way which allows them to respond most effectively to their site context.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/076 (CSC2055267)	Mrs Jennifer Grace Withall	CH5	After viewing the plans for Tilgate and the possibility of 100 more dwellings, I would draw your attention to homes for sale and in particular for elderly people looking for ground floor access. The other idea would be for stair lifts or lifts to other floors. There are very few of these type of properties to buy in Tilgate at present. Many thanks	
REP/078 (CSC2053996)	Mr. Clive Narainen	CH6	Support	None
REP/066 (CSC2055283)	Mr. Mark Mathews Thames Water Utilities	CH6	Thames Water support the policy in principle, but consider that it needs to be improved in relation to sewerage infrastructure. Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to underground sewerage [and water supply] infrastructure and consideration should be given to this in the selection of species and location of planting.	Include reference to the need to take account of sewerage [and water supply] infrastructure when planting trees.
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH6	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area.	
REP/055 (CSC2055721)	T&L Crawley LLP Rapleys	CH6	Policy CH6: Tree Planting and Replacement Standards We consider that the tree replacement standards (including the approach to the additional and replacement tree planting requirements) as set out in Policy CH6 are too prescriptive and fail to allow individual circumstances of a given site to be taking into account. Therefore, we object to the policy and the standards should be deleted, and the wording of the policy should be amended	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/060 (CSC2052787)	Mr. Laurence Skinner	CH7	Consideration should be given at the design stage to the positioning of mobile phone masts.	
REP/005 (CSC2055592 & CSC2055693)	Mr. Richard Bucknall Tony Fullwood Associates	CH7	The policy seeks to: protect and/or enhance areas of structural landscaping and to demonstrate the visual impact of the proposals on these areas as part of the planning application submission. This is a test applied to designated heritage assets such as conservation areas and as written resembles a presumption against development and is inconsistent with the approach in NPPF or the reasoned justification. Para 4.37 explains that the policy seeks to ensure that development schemes identify and take account of existing structural landscape assets which are a positive element of the character of the town and this should be more accurately reflected in the policy.	Policy CH7 must be reworded to ensure it is positively prepared and consistent with national policy. Policy CH7: Structural Landscaping Areas of soft landscape that make an important contribution to the town and its neighbourhoods, in terms of character and appearance, structure, screening or softening, to the town and its neighbourhoods have been identified on the Local Plan Map. All development proposals will be required to take account of existing structural landscape assets and protect and/or enhance their character and demonstrate the visual impact of the proposals on these areas as part of the planning application submission. Where limited or weak structural landscaping can be identified as a negative factor in the attractiveness of an area, opportunities will be sought to deliver enhancements as part of new development proposals.
REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council	CH8	MVDC notes that policy CH8 safeguards the long distance view northwards from Tilgate Park into the countryside of Mole Valley. Leith Hill and Box Hill are mentioned as important landmarks in such views, both of which lie within Mole Valley. MVDC welcomes this recognition of the attractive countryside in the southern half of Mole Valley, the Green Belt status of which helps to maintain its open, rural character and safeguard views towards the Surrey Hills Area of Outstanding Natural Beauty, which includes Leith Hill and the North Downs escarpment, including Box Hill. Indeed, the countryside of Mole Valley helps to fulfil Crawley Borough Council's vision of "town within a countryside setting that is very much valued by local people" (Crawley 2030: A Vision).	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield	CH8	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area.	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
	Conservation Area Advisory Committee)			
REP/049 (CSC2055743)	Mr. James Walton Network Rail	CH8	Regarding Para. 4.38 - Important Views; several of the protected views stretch across the operational railway, as such Network Rail requests these should be less of a consideration where there is a requirement to undertake development in the interest of public safety and improving the operational railway infrastructure.	
REP/038 (CSC2055226)	Mr. Bill Sanders Lynton Developments Ltd.	CH9	The Upper Mole Farmlands Rural Fringe Policy area CH9 extends south to Hydehurst Lane. However the Gatwick Safeguarded Land Policy area GAT 2 boundary is further to the north of Hydehurst Lane. If this 3ha area between Hydehurst Lane and the GAT 2 boundary remains in CH9 it would be inconsistent with written policy EC1 Sustainable Economic Growth.	There is an area of approximately 3ha north of Hydehurst Lane but south of the Gatwick safeguarding boundary that should be removed from the CH9 policy area and should instead be allocated for employment purposes as an extension to the Manor Royal strategic employment area. The reasons are to provide additional much need employment land as explained in our representations to policy EC1 Sustainable Economic Growth.
REP/059 (CSC2055282)	Mr. Richard Symonds The Ifield Society	CH9	I fully support CH9 (option I) in which a sound "Local Green Space " policy is developed in Ifield Brook Meadows, "to maintain Crawley's compact nature and attractive setting whilst conserving and enhancing the countryside (See ENV3 Submission) (+ Statement of Community Involvement). This CH9 policy is critically important for 3 primary reasons: (1) Ifield Brook Meadows is a unique area within the ancient Parish of Ifield, with its 1000-year history, going back to the Domesday Book. It is a special area of recreation - not just for dog-walkers-rich in heritage, character and wildlife; enjoyed throughout the centuries; and must be conserved and enhanced for the present and future generations. (2) This view regarding Ifield Brook Meadows has been consistently expressed by the local community at every stage of the Crawley Local Plan- and especially over the last 14 years with the West Sussex County Council Local Structure Plan and Horsham District Council's Local Plan and JAPP. (3) Local residents, The Ifield Society (and others) have also opposed most strongly- and often bitterly- any suggestion by the Welbeck Consortium (and 'Partners') that land " West of Ifield" can support a monstrous development of up to 3,500 houses (See Topic Paper 5- Unmet Needs). We are relieved to see that both Crawley and Horsham Councils agree.	No Change.
REP/007 (CSC2055494)	Mr. John Byng	CH9	This paragraph should make plain that a second runway at Gatwick, within the green gap between Gatwick and Crawley, would be incompatible with the policy of maintaining the character of Crawley as a compact town with good access to	Add to the end of paragraph 4.45: "Similarly the plan to build a second runway at Gatwick will be resisted."

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			the countryside and will be resisted. The fact that Crawley BC will not have the final say is irrelevant – the plan should set out what the town wants.	
REP/032 (CSC2055522)	Mr. Andrew Shaw High Weald AONB Unit	CH9	The AONB Unit support this policy and its general policy of constraint towards the rural fringe edges of Crawley. The direct reference to the High Weald AONB under the south of Broadfield section is particularly welcomed and provides a criteria based framework on which to assess any future proposals in this area.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH9	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area. Outside the Ifield Village Conservation Area, the designation of the 'Arts and Crafts' houses in Rusper Rd as an Area of Special Local Character (CH14) is welcomed. These houses continue into the Horsham section of the Rusper Rd. It would be good to see a Horsham District Council policy which was similar to the Crawley one. We strongly support CH10 the protection of the High Weald ANOB.	
REP/043 (CSC2055622)	Mr. Derek Meakings	CH9	Sirs, your vision of 2030 looks to be commendable goal providing the necessary funding from outside the town is obtained to achieve all of the necessary infrastructure improvements that are in already in many cases totally inadequate. My big concern is that most of the vision will be totally unachievable should a 2nd runway be developed, bringing only a small proportion of new jobs for existing residents with most new jobs going to inward migrants from the wider UK, the EU and commuters from all over the SE. With an airport the size of Heathrow under 2 miles from Queens Square, increased traffic, passengers, 45000 new houses in the area, there is absolutely no way Crawley will be able to avoid becoming just like all the previously green towns around Heathrow. Crawley will become congested, polluted and urbanised with no green spaces and no green belt, just like the towns around Heathrow. Sincerely hope you will be able to implement much of this existing Crawley 2030 plan, which will be extremely difficult even without a 2nd runway. Would you choose to live near Heathrow, then please ensure Crawley does not become like it.	
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	CH9	We note that point vii states, "Does not generate traffic of a type or amount inappropriate to the rural roads." Although development may be located in a rural setting this can generate traffic on the SRN.	Therefore the wording of this point should reflect the importance of protecting the SRN from any impacts of rural development and that any impacts should be mitigated accordingly.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/032 (CSC2055522)	Mr. Andrew Shaw High Weald AONB Unit	CH10	The Unit supports the inclusion of a separate policy relating to the AONB and supports the direction of this policy. The inclusion of a direct reference to the High Weald AONB Management Plan in the policy is particularly welcome and helps provide a criteria based framework to support and assess proposals in this nationally sensitive area.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH10	We strongly support CH10 the protection of the High Weald ANOB.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH11	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH12	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area.	
REP/049 (CSC2055743)	Mr. James Walton Network Rail	CH12	Regarding Para. 4.11 'Heritage; in the interest of continually improving the operational railway infrastructure and the public safety Network Rail would like to be consulted if any intention is expressed to protect or list its post 1947 assets.	
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council	CH12	Heritage Assets Policy CH12: It is recommended that wording be added in the third paragraph along the lines of "proposals will need to demonstrate how they have recorded the heritage asset in line with a written scheme of investigation submitted to and approved by Crawley Borough Council, or, in the case of standing structures, to a minimum of English Heritage recording Level 2 (etc)."	See above.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>The English Heritage 'recording levels' (ranging from level 1 to 4) are intended as a guide to the criteria expected for recording buildings but are not designed for archaeological fieldwork. However this wording amendment would help to make clear that CH12 applies to below-ground assets as well as above-ground structures.</p> <p>Paragraph 4.55: Building on policy BN17 Archaeology, a saved policy from the Crawley Local Plan 2000, WSCC welcomes the commitment that it will be "a priority for development to ensure that it respects all aspects of the town's built and natural heritage."</p> <p>In nearly two decades of development-led archaeological investigation in Crawley there have been some remarkable discoveries which have contributed greatly to understanding how it grew from a village settlement into a small town becoming a 20th century New Town after the war.</p> <p>The West Sussex Historic Environment Record is referred to in the Plan but the emphasis of Paragraph 128 of the NPPF on consulting the relevant historic environment record would be welcome as would the use of appropriate expertise in the assessment of heritage assets and the value of desk-based assessment and field evaluation in establishing the impact of proposals.</p> <p>The English Heritage guidance note on the soundness of local plans in respect of historic environment matters underlines the importance of proper assessment of the significance of heritage assets (including the potential for finding new sites of archaeological or historic interest) and of having policies for the conservation, enhancement and enjoyment of historic environment. See link to the English Heritage HELM website below: http://www.helm.org.uk/guidance-library/heritage-in-local-plans/</p>	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH13	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular Importance to Ifield Village Conservation Area.	
REP/082 (CSC2055112)	Miss Sarah Fortnam	CH13	Firstly whoever produced this form can't spell! Please has an l in it! Secondly I strongly disagree with ANY traveller sites and.....I think the proposal of using any green land for this purposes should be rejected and their are far more worthy causes which our society would benefit from. The area should be	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			conserved and used to benefit everyone who contributes, it should be used by our children to learn about our environment.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH14	Outside the Ifield Village Conservation Area, the designation of the 'Arts and Crafts' houses in Rusper Rd as an Area of Special Local Character (CH14) is welcomed. These houses continue into the Horsham section of the Rusper Rd. It would be good to see a Horsham District Council policy which was similar to the Crawley one.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH15	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Conservation Area Advisory Committee)	CH16	Ifield Village Association supports all character policies. CH6, CH8, CH9, CH11, CH12, CH13, CH15, CH16 are of particular importance to Ifield Village Conservation Area.	
REP/005 (CSC2055592)	Mr. Richard Bucknall Tony Fullwood Associates	CH17	As currently worded, Policy CH17 requires all development proposals within the boundaries of the Historic Parks and Gardens as identified on the Local Plan Map to demonstrate, through a Heritage Impact Assessment, that the proposals have regard to the designation, character and setting of the area and that proposals preserve or enhance the area. Crawley does not have any Parks and Gardens of Special Historic Interest that are designated as nationally important by English Heritage. The Historic Parks and Gardens are local designations and, although valued locally, should not be given protection beyond that afforded in the NPPF. The current policy to preserve or enhance the area is a test applied to designated heritage assets such as Parks and Gardens of Special Historic Interest and as written resembles a presumption against development and is inconsistent with the approach in NPPF. The NPPF states that in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having	Policy CH17 must be reworded to ensure it is positively prepared and consistent with national policy. The following sites are designated and shown on the Local Plan Map as Historic Parks and Gardens: <ul style="list-style-type: none"> • Worth Park • Land South St Nicholas Church • Broadfield Park • Tilgate Park • Goffs Park • Memorial Gardens The council will support development, unless it will have a negative impact upon the historic setting and character of the designated

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			regard to the scale of any harm or loss and the significance of the heritage asset (Para.135).	Historic Park and Garden. All development proposals within the boundaries of the Historic Parks and Gardens as identified on the Local Plan Map will be required to demonstrate, through a Heritage Impact Assessment, that the proposals have regard to the designation, character and setting of the area. Only proposals that demonstrate how they have regard to the character or setting of the Historic Parks and Gardens will be permitted.

Economic Growth

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council		<p>With respect to employment land, MVDC notes that there is an unmet need for employment land within Crawley Borough and that Crawley BC intends to work with the Gatwick Diamond LPAs to investigate the most appropriate locations for employment growth close to Crawley and Gatwick Airport. For reasons set out in MVDC's response to the Duty to Cooperate Statement, the southern part of Mole Valley is heavily constrained by Green Belt policy and other issues including flooding, noise and poor transport connections.</p> <p>These constraints are likely to weigh against any significant provision of new employment land in the rural areas in the south of Mole Valley. Nevertheless, MVDC will continue to work with neighbouring authorities through the Gatwick Diamond initiative and in partnership with the Coast to Capital LEP which provide the appropriate framework for strategic employment issues to be addressed in a co-ordinated manner.</p>	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited		<p>Economic Development Policies The airport is a significant generator of economic value for London and the South East economies. The airport campus offers a wide diversity of jobs which in turn require a spectrum of skills sets and capabilities. It is important for the Plan to ensure the economic benefits and opportunities from the airport are fully realised and for the benefit of Crawley and the surrounding area as well as sub regional, regional and national economies. This includes ensuring the maximum and efficient use of land at the airport for development.</p> <p>We strongly support the draft Plan policies in this regard and specifically Policy GAT4 which acknowledges it may be appropriate to lift restrictions on the use of non - aviation related offices at the airport. We further support the policies aimed at promoting a more vibrant and diverse use of the airport property portfolio and facilitating positive economic activity and further employment opportunities at the airport. This also encompasses the local policies promoting the delivery of essential infrastructure such as planned road and rail improvements. GAL also supports the overarching position of the Local Plan with a presumption in favour of sustainable development which is in line with GAL's aspiration to develop and intensify the economic activities and the employment profile of the airport.</p> <p>We would like to see the diversification and intensification of the employment and associated economic opportunities at the airport supported within the CBC Local Plan so that we can work jointly with CBC to address any concerns regarding local and sub-regional economic deficiencies. Going forward it is important that we build on our strong working relationships with CBC to enable employment levels to be</p>	<p>The Local Plan refers to Gatwick Airport as being a key employment location within the Borough and wider region. However, the Airport is only mentioned in passing within Policy EC2 as an employment location. The details of the Gatwick Airport policies are contained within GAT 1 - 4. Therefore, in our view, there is an opportunity to further promote the ability of Gatwick Airport to meet future employment needs within the general Employment section of the Plan.</p> <p>GAL strongly believes that the Airport has the potential capacity to meet wider employment needs than just airport related employment. This approach is already supported in the proposed wording in GAT4 and is wholly supported by GAL. However, there may be a greater opportunity not only to widen the range and nature of employment uses at the airport but also to assist with meeting CBC's needs to allocate additional employment space. It is considered that it may be possible to achieve this without affecting "the long term ability of the airport to meet the floorspace need necessary to meet the needs of the airport as it expands and will not</p>

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			<p>maximised and allow for a diversity of new employment opportunities to be available at the airport.</p> <p>GAL recognises the crucially important economic role that Gatwick plays locally, regionally and at a national level. We believe that it will be important to develop a joint strategy with CBC and the local community so that existing jobs can be retained at the airport to support sustainable growth objectives, so that new employment can be offered at the airport. In that regard GAL are keen to support policies for working with education and training providers to identify future skills sets required and to develop new educational opportunities.</p> <p>GAL supports the overall vision promoted in the Plan particularly the strategic importance of the airport in the future development and economic growth of Crawley and the wider sub region. We welcome in para 2.6 of the Plan the clear recognition of the airport as the economic core of the borough and the airport being a key contributor to economic buoyancy of Crawley, para.2.15.</p> <p>Gatwick supports the need for the consideration within the Plan of the Local Strategic Statement and specifically the objective set out in para 2.35, and of the Corporate Plan particularly para 2.36 (1) to encourage economic and employment growth at the airport, plus the integration into the Plan of the priorities of the Crawley Economic Plan in supporting the development of Gatwick (2.38 (c)).</p> <p>However, GAL believes that the Plan has not fully recognised the opportunities for new and significant employment opportunities at Gatwick Airport.</p> <p>Employment Land which could be brought forward at the airport offers a highly sustainable option due to the excellent existing (and planned future) transport connectivity and sustainable modes of transport.</p> <p>The CBC Local Plan has identified a shortfall in Employment Land of approximately 34.9 hectares through the Plan period up to 2030. The CBC Employment Topic paper and Employment Trajectory note both set out the phased delivery of employment sites over the plan period. The provision of employment land to meet needs heavily relies on existing sites and sites with planning permission for the initial stage (years 1 &€" 5) and the provision of land that is currently safeguarded for a possible second runway at Gatwick through the latter years (years 6 to 15) of the Plan. In addition GAL notes that the employment section of the Plan focuses only on industrial, warehousing and office uses which we consider may limit potential opportunities.</p> <p>Whilst it is the case that the Plan should identify sufficient employment land to meet future employment needs for the Plan period, CBC, has suitably indicated that as a</p>	<p>have an unacceptable impact on the roles and function of Crawley Town Centre or Manor Royal" (as proposed by draft Policy GAT4). The airport is a highly sustainable location for employment floorspace. The diversification and intensification of the employment uses at the airport would benefit the airport and the wider Borough.</p> <p>Gatwick has significant advantages as an employment location. The space is already an allocated employment space on the basis that it falls within the airport boundary. Such employment space offers a highly sustainable location with easy access to central London and Brighton and more locally via local, regional and national train and bus networks. These transport networks will be improved significantly within the Plan period. New employment space is available and deliverable within the short term. Importantly its future is unaffected by either the continued operation of a single runway or potential future two-runway scenario. It is thus appropriate to consider identifying a broader range of employment opportunities with the Plan in addition to the B1, B2 & B8 Use Classes.</p>

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			<p>result of the uncertainty over safeguarded land for R2, they cannot be certain that the potential additional employment land can be delivered until the Outcome of the Airport Commission is realised. GAL considers that this uncertainty could be mitigated by working with the adjoining authorities of Reigate and Banstead, Mole Valley and Horsham under the Duty to Cooperate.</p> <p>The Local Plan refers to Gatwick Airport as being a key employment location within the Borough and wider region. However, the Airport is only mentioned in passing within Policy EC2 as an employment location. The details of the Gatwick Airport policies are contained within GAT 1 - 4. Therefore, in our view, there is an opportunity to further promote the ability of Gatwick Airport to meet future employment needs within the general Employment section of the Plan.</p> <p>GAL strongly believes that the Airport has the potential capacity to meet wider employment needs than just airport related employment. This approach is already supported in the proposed wording in GAT4 and is wholly supported by GAL. However, there may be a greater opportunity not only to widen the range and nature of employment uses at the airport but also to assist with meeting CBC's needs to allocate additional employment space. It is considered that it may be possible to achieve this without affecting "the long term ability of the airport to meet the floorspace need necessary to meet the needs of the airport as it expands and will not have an unacceptable impact on the roles and function of Crawley Town Centre or Manor Royal" (as proposed by draft Policy GAT4). The airport is a highly sustainable location for employment floorspace. The diversification and intensification of the employment uses at the airport would benefit the airport and the wider Borough.</p> <p>Gatwick has significant advantages as an employment location. The space is already an allocated employment space on the basis that it falls within the airport boundary. Such employment space offers a highly sustainable location with easy access to central London and Brighton and more locally via local, regional and national train and bus networks. These transport networks will be improved significantly within the Plan period. New employment space is available and deliverable within the short term. Importantly its future is unaffected by either the continued operation of a single runway or potential future two-runway scenario. It is thus appropriate to consider identifying a broader range of employment opportunities with the Plan in addition to the B1, B2 & B8 Use Classes.</p>	
REP/033 (CSC2055843)	Horsham District Council		<p>In terms of economic growth, the references to joint working on the Economic Growth Assessment 2014 are welcomed. We note that you are focussing future development on existing employment sites such as Manor Royal, the Three Bridges corridor, and Maidenbower Business Park, and other existing sites, with the aim to improving them. We also note that, with regards to allocating new strategic employment land, the preferred location is to the north of Manor Royal and south or</p>	

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			<p>east of Gatwick airport but that identifying an appropriate site requires further work and this will not take place until a decision on additional runway capacity is determined. Horsham District Council would like to continue working closely with Crawley Borough Council on any employment issues including strategic employment issues.</p> <p>Town Centres: We note that an objective of the plan is to promote Crawley's vitality and viability as a sub-regional retail centre. The town centre first approach to retail development in the Borough is noted. 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, such as Horsham, perform. We welcome ongoing discussions about the complementary and supportive role of Horsham town centre.</p>	
REP/037 (CSC2053564)	Mr. Bill Sanders Lynton Developments Ltd.	EC1	<p>Lynton Developments Ltd supports the following text: "The preferred location for strategic employment is within the borough, to the north of Manor Royal and south or east of Gatwick Airport, identified as the Area of Search on the Key Diagram. However, given current safeguarding of this land for a possible second runway at Gatwick, work required to identify an appropriate site, or sites, for further business development will take place after the government has issued a final decision on additional runway capacity in the UK, and has determined whether the area should still remain safeguarded.</p> <p>We have previously submitted on their behalf a representation to the Council's Employment Land Trajectory consultation proposing that the land north of Hydehurst Lane, Manor Royal is allocated for employment development in the event that the Gatwick Airport second runway safeguarding is withdrawn. See attached document.</p> <p>On the Proposals Map there is 3ha of land between the Gatwick Airport safeguarding policy GAT2 boundary and Hydehurst Lane that is currently shown as in the Upper Mole Farmlands Rural Fringe (Policy CH9) but should instead be allocated now for employment development purposes.</p>	Not applicable
REP/046 (CSC2054416)	Mr. Steve Sawyer MRBD Limited (The Manor Royal BID Company)	EC1	<p>MRBD agrees with this policy and welcomes the inclusion of Manor Royal Business District and the intention to build upon and protect its established role as a key business location supporting B Use Classes.</p> <p>We recognise the issue of limited land supply that has become more marked in recent months and likely to become more severe, as the EGA indicates. This situation is made worse by proposals by the Government to extend permitted development rights to allow permitted changes of use from B Class Uses to Residential.</p>	No specific modification required

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			<p>We feel strongly this undermines the core function and form of Manor Royal as a key employment location and that the Council should take steps to resist these changes, which are otherwise allowed to happen in an unplanned, piecemeal and opportunistic way. This might necessarily include considering an Article 4 Directive to introduce a level of managed control that is otherwise completely lost.</p> <p>We would also welcome consideration of how the Borough Council, working alongside and in partnership with the Manor Royal BID Company, might use available planning tools in a positive way to encourage the kind of economic growth and investment compatible with the current core function of Manor Royal – and as set out in the Manor Royal BID Plan and documents issued by the Council including the Manor Royal Masterplan - the vision for Manor Royal.</p>	
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	<p>Whilst redeveloping and revitalising the town centre and further regeneration of the Manor Royal Business District are important elements of an economic growth strategy for Crawley, the strategy should include reference to development of new areas of land for employment purposes given the findings of the Economic Growth Assessment (EGA) referred to in paragraphs 5.9 - 5.12.</p> <p>The EGA forecasts that Crawley's economy will grow significantly during the local plan period and that the town should remain the economic focus for the sub region; the EGA identifies a future need for 77 hectares of business floorspace and after taking account of existing supply there is a need for new land provision of some 35 hectares.</p> <p>Paragraph 5.13 goes on to state that there is a risk that strategic growth of the wider Gatwick Diamond could be constrained if additional land cannot be identified at the Heart of the Gatwick Diamond.</p> <p>Paragraph 5.14 states clearly that the significant demand for business land should in the first instance be directed to Crawley in order to build upon its key role as the economic focus at the Heart of the Gatwick Diamond and excellent connectivity with Gatwick Airport.</p>	<p>The second paragraph, first sentence of the economic growth strategy should be revised to read: "Redeveloping and revitalising the town centre and further regeneration of the Manor Royal Business District together with the development of new areas of land for employment growth will make Crawley the place to do business in the South East".</p>
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	<p>The reference in paragraph 5.5 that the Local Plan will help meet quantitative and qualitative demand for all types of economic activity is supported. Meeting qualitative demand will be essential if the economic strategy is to be successfully implemented.</p> <p>This will require the needs of different business sectors to be understood and such needs reflected in the identification of sites taking account of locational, environmental and access requirements.</p>	

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			The current Core Strategy identifies 'employment opportunity areas' to the north of Fleming Way intended to help diversify the local economy by attracting high tech firms, knowledge based firms, and financial services. However, the sites have not been attractive locations for these types of business and Tesco were allowed to develop a distribution centre on one of the sites. New business sites need to be of sufficient quality to attract businesses that will help the local economy grow and diversify. This is will likely require the release of greenfield sites in high quality locations accessible to the main transport network and in close proximity to Gatwick Airport.	
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	<p>The identification through the Economic Growth Assessment of the future need for 77 hectares of business floorspace including the need for new business land provision of some 35 hectares to support future economic growth in the Borough is supported.</p> <p>The statement in paragraph 5.12 that given the scale of unmet business floorspace need, the Council will need to assess the suitability for, and implications of, new business locations within and, if necessary, beyond the Borough boundary during the Plan period to 2030 is supported.</p> <p>The recognition in paragraph 5.13 that there is a risk that strategic growth of the wider Gatwick Diamond could be constrained if additional land cannot be identified at the Heart of the Gatwick Diamond is also supported.</p>	
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	<p>The recognition in paragraph 5.14 that the significant demand for business land should in the first instance be directed to Crawley in order to build upon its key role as the economic focus at the Heart of the Gatwick Diamond and excellent connectivity with Gatwick Airport is supported.</p> <p>The sequential approach which gives first priority to delivering sites on land within Crawley, in the north of the Borough is also supported given the proximity of this area to the Manor Royal Business District and Gatwick Airport, and the potential for good transport access.</p> <p>The statement in paragraph 5.14 that a thorough assessment of employment site options will be undertaken once a final decision has been published on UK airport expansion will frustrate economic development but is an inevitable consequence of Government policy to safeguard land for a possible 2nd runway at Gatwick. However, what is not clear in paragraph 5.14 is the means by which the assessment would take place and how any sites are to be identified. The Council is clear in its view in Topic Paper 1 on Gatwick Airport (section 3) that following a Government decision on the future of a second runway a review of the Local Plan will be required whatever the outcome.</p>	<p>Paragraph 5.14 should be revised to include an additional sentence at the end to read:</p> <p>"A review of the Local Plan will be undertaken once the Government has issued a final decision on UK airport expansion".</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			However, the Council's Local Development Scheme July 2014 which sets out the Council's programme for future plan making does not include any provision for a Local Plan review and the matter needs to be clarified.	
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	<p>Paragraph 3 of Policy EC1 which states that as a minimum an additional 35ha of land for business uses is required in order to secure future economic growth at Crawley is supported. Paragraph 4 which states that any strategic employment location(s) will be of a scale and function that helps meet identified quantitative and qualitative needs for business development is also supported.</p> <p>However, it is unclear in paragraph 4 what is meant by 'minor extensions in proximity to Manor Royal may be appropriate' and how this will be implemented. No provision for such extensions has been made on the Local Plan Map either by site allocation or by changes to the Built-Up Area Boundary. If such extensions are intended to be exceptions to the Built-Up Area Boundary then it is unclear as to what criteria would apply in order to justify them.</p> <p>In this regard, a development opportunity exists on land at Jersey Farm, west of County Oak that is outside the safeguarding area for a possible 2nd runway at Gatwick airport and would help meet the identified need for further employment land.</p> <p>The Area of Search referred to in paragraph 5 of the policy and shown on the Key Diagram is supported given the proximity of this area to the Manor Royal Business District and Gatwick Airport and potential for good transport access. However, paragraph 5 is unclear as to how the work required to identify an appropriate site or sites for further business development will be undertaken after the Government has issued a final decision on additional runway capacity in the UK. The Council is clear in its view in Topic Paper 1 on Gatwick Airport (section 3) that following a Government decision on the future of a second runway a review of the Local Plan will be required whatever the outcome. However, the Council's Local Development Scheme July 2014 which sets out the Council's programme for future plan making does not include any provision for a Local Plan review and the matter needs to be clarified.</p>	<p>Paragraph 4 of Policy EC1 should be revised to include the criteria by which the Council would consider that minor extensions in proximity to Manor Royal would be appropriate which could include considerations relating to the need for development, traffic and access arrangements, landscape and ecology, and design and layout.</p> <p>Paragraph 5 of Policy EC1 should be revised to include an additional sentence at the end to read: "A review of the Local Plan will be undertaken once the Government has issued a final decision on UK airport expansion".</p>
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	The statement in the second sentence of paragraph 5.20 that further strategic employment land may be needed in the medium to long term is at odds with the first sentence which recognises an outstanding need for a further 35 hectares of land and the Economic Growth Assessment evidence described in paragraphs 5.11 - 5.14. The evidence justifies a more positive statement that further strategic employment development will be needed.	The second sentence of paragraph 5.20 should be revised to read: "The Council considers that, in order to respond to this demand and to the potential for growth beyond this level, further strategic employment development will be needed in the medium to long term."
REP/071 (CSC2055440)	Mr. Gary Scott Windsor Developments Ltd.	EC1	In the third sentence of paragraph 5.21 it is misleading to justify the Area of Search 'particularly because this area cannot accommodate housing development because of aircraft noise'.	The third sentence of paragraph 5.21 should be revised to read: "This area reflects evidence that the preferred

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			It is justified on the grounds of its proximity to the Manor Royal Business District and Gatwick Airport, the potential for good transport access and it is in the area of greatest demand in Crawley.	location for any additional employment land, given the scale and quality required, would most likely be in the form of a Strategic Employment Location or Locations to the north of Manor Royal and south east of Gatwick Airport in view of its proximity to the Manor Royal Business District and Gatwick Airport, the potential for good transport access and its location in the area of greatest demand in Crawley.”
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	EC1	We support the principle of protecting and enhancing Crawley’s role as the key economic driver for the Gatwick Diamond. However, it is important that the objectives of the Local Plan remain deliverable, in line with the requirements of the NPPF. Local Plans should respond flexibly to the needs of the market and be able to adapt to changing circumstances. To ensure deliverability and flexibility, policies set out within the Local Plan should seek to stimulate the development of employment floorspace while retaining sufficient flexibility to respond to market and economic conditions. The long term protection of retail, commercial and industrial hubs is likely to be restrictive and could ultimately preclude the promotion of sustainable development. Policy should recognise that each site should be treated on its own merits with regard to what is deliverable, given the development constraints of individual sites.	The constraints and opportunities of each site should be assessed and the policy should adopt a balanced approach to development, having regard to the individual nature of development sites
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	EC1	Whilst we do not consider the plan itself to be unsound, we have some comments about the evidence base. Employment: We do not object to the overall approach to employment land provision in the CBC Local Plan and appreciate the problems that the current uncertainty about the future for Gatwick Airport poses for the Council. In that respect, we support the approach set out in Policy EC1. We would, however, like to clarify Reigate & Banstead’s own plans for employment land provision as we feel that these have been misinterpreted in the Unmet Needs Topic Paper. Table 5 of this paper presents ‘planned strategic employment developments Crawley or within neighbouring authorities’. It incorrectly identifies the employment growth in our Core Strategy as being strategic development in fact this provision is to meet Reigate & Banstead’s own local needs. It would not therefore be ‘available’ to fulfil the local needs of any adjoining authority, and no additional ‘headroom’ has been identified in the borough to meet the needs of neighbouring authorities.	We do not seek modifications to the Local Plan as currently worded, however we would not support any assumption or expectation at this stage that Reigate & Banstead Borough has capacity to meet some of the unmet local employment needs of Crawley Borough as this would not be supported by our own evidence of potential future supply. We will continue to work with CBC and other Gatwick Diamond authorities as we prepare detailed site allocations and receive the findings of our scoping work in relation to strategic employment needs.

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			<p>The 'green blobs' in Appendix B of the paper do not correspond with our local employment areas.</p> <p>We have recently commissioned work to scope out the possibility of additional employment development in the borough to meet 'strategic needs' (defined as growth that falls outside of local demand and needs). However we do not yet have the conclusions of this work, nor have we made any policy provision for such development.</p>	
REP/007 (CSC2055494)	Mr. John Byng	EC1	The whole section on sustainable economic growth needs to be clear that a second runway at Gatwick would be unwelcome. A second runway would add to the difficulty of a tight labour market in Crawley, it would add to the housing difficulties of Crawley, it would add to the general infrastructure difficulties of the region and it would add to the risk of serious economic difficulties for the region if an oil price increase caused a decline in aviation. The plan should indicate a desire to diversify the local economy so that Crawley becomes less heavily reliant on Gatwick for employment.	Many amendments are required to indicate a wish to diversify the local economy rather than become more reliant on Gatwick for direct and indirect employment. Such heavy reliance on Gatwick is a serious economic risk and so incompatible with sustainability objectives.
REP/018 (CSC2055567)	Costco Wholesale UK Ltd	EC1	<p>This representation is submitted on behalf of Costco Wholesale UK Ltd (Costco) who operate a number of wholesale warehouse clubs throughout the country, typically located on employment/industrial land. Costco operate sui generis membership warehouses which serve the wholesaling needs of the small to medium sized business owner.</p> <p>At Costco, businesses can purchase products at wholesale prices, which are significantly lower than those of traditional sources of distribution. Businesses can obtain most of their inventory needs from under one roof. Each warehouse sells a wide range of products, although the variety within each product range is limited. This enables Costco Wholesale to serve a wide range of businesses, providing a core range of products at low prices. Costco is a reputable employer and would assist Crawley in achieving their economic objectives. The level of jobs provided by Costco compares favourably in employment density levels to traditional B Class Uses. The company provides local people with a broad range of quality jobs that reflect the unique nature of Costco's operations. In addition there would be indirect job creation through the support given to local businesses. Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training. The benefits of a warehouse club such as Costco are that the positive impacts spread throughout the local economy. Costco's target</p>	<p>It is considered that Policy EC1 part i) should be amended to recognise that sui generis uses are appropriate employment generating uses and would be entirely appropriate within Manor Royal.</p> <p>It is proposed part i) of Policy EC1 is amended as follows: i) Build upon and protect the established role of Manor Royal as the key business location (B Use Classes and closely related uses not falling within a use class, i.e. sui generis uses) for Crawley at the heart of the Gatwick Diamond; and</p>

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			<p>customer is small and medium sized businesses and many of these can be found in town centres.</p> <p>Costco's target customers include:</p> <ul style="list-style-type: none"> • Independent Retailers • Food and drink outlets such as restaurants and sandwich shops • Service outlets such as small estate agents, accountants, garages and professional firms • Independently owned hotels, guest houses etc. <p>Costco can therefore make a significant contribution to the health of the local economy and, particularly to businesses that are otherwise forced to pay a premium for small purchases from traditional wholesale sources. Costco's prices and its range of products are unique in this respect. The potential positive benefits of a Costco were the subject of an independent report by CBRE in May 2011 'Costco Warehouse Clubs - An Assessment of Economic Impacts'. This report updates the work that CB Hillier Parker undertook in October 2000. The report confirmed the substantial cost savings potentially available to local businesses as well as the significant penetration which Costco achieves of local business memberships. 73% of members questioned in the study agreed that Costco's low prices help them retain competitive and the study drew the conclusion that: -</p> <p>"Overall Costco provides significant positive benefits to members and local businesses in areas where Costco warehouse clubs are located. (Para. 6.73)"</p> <p>The construction of a Costco in Crawley would bring a number of benefits to small businesses and the wider economy in terms of employment generation for both a skilled and unskilled workforce.</p> <p>The recently published National Planning Policy Framework (NPPF) (March 2012) promotes sustainable economic growth 'The presumption in favour of sustainable development (NPPF Para 14)' "At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking.</p> <p>For plan-making this means that;</p> <ul style="list-style-type: none"> • Local planning authorities should positively seek opportunities to meet the development needs of their area; • Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless; <ul style="list-style-type: none"> ○ any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or 	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>○ specific policies in this Framework indicate development should be restricted.”</p> <p>There is a clear emphasis in Government guidance that authorities should not be overly prescriptive regarding specific uses and should be seeking to positively promote economic growth.</p> <p>It is important for authorities to provide sufficient flexibility in policies to promote a prosperous economy able to accommodate changing business needs. Markets and economies evolve and not all new businesses fit within traditional use class definitions. Specialist operations have an important role to play in the economy and it is helpful for authorities to recognise those uses that are appropriate on employment land within the relevant planning policy framework. Documents should provide clear guidance to operators and developers thus encouraging development. The NPPF as highlighted above also promotes flexibility. It emphasises at Paragraph 21 that: “Investment in business should not be overburdened by the combined requirements of planning policy expectations.” It goes on to indicate that local authorities should: “Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policy should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”</p> <p>To comply with the NPPF it is considered that there should be more flexibility within Policy EC1: Sustainable Economic Growth to recognise that a wide range of employment uses are considered acceptable at Manor Royal in addition to B Use Classes. All employment areas/business areas including Manor Royal should equally be recognised as being suitable for employment generating development including sui generis uses such as warehouse clubs.</p>	
REP/043 (CSC2055622)	Mr. Derek Meakings	EC1	Sirs, your vision of 2030 looks to be commendable goal providing the necessary funding from outside the town is obtained to achieve all of the necessary infrastructure improvements that are in already in many cases totally inadequate. My big concern is that most of the vision will be totally unachievable should a 2nd runway be developed, bringing only a small proportion of new jobs for existing residents with most new jobs going to inward migrants from the wider UK, the EU and commuters from all over the SE. With an airport the size of Heathrow under 2 miles from Queens Square, increased traffic, passengers, 45000 new houses in the area, there is absolutely no way Crawley will be able to avoid becoming just like all the previously green towns around Heathrow. Crawley will become congested, polluted and urbanised with no green spaces and no green belt, just like the towns around Heathrow. Sincerely hope you will be able to implement much of this existing Crawley 2030 plan, which will be extremely difficult even without a 2nd	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			runway. Would you choose to live near Heathrow, then please ensure Crawley does not become like it.	
REP/079 (CSC2055699)	Homes and Communities Agency	EC1	Policy EC1: Sustainable Economic Growth 3.5 Comment: The HCA welcomes CBC's aspiration for economic growth over the plan period, specifically the aspirations to build upon and protect the established role of Manor Royal as a key business location. While the HCA site at Rowley Farm falls within the safeguarded Gatwick boundary, it does have longer term potential to contribute to policy EC1 and the sustainable economic growth of the Borough should a second runway not come forward. The policy's reference to future flexibility for the site, following the Governments decision is therefore supported. The HCA therefore consider this policy sound.	
REP/013 (CSC2055701)	Crest Strategic Projects	EC1	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/049 (CSC2055743)	Mr. James Walton Network Rail	EC1	Development Site Allocations Network Rail agrees with Para. 6.20 which states, "planning policies should avoid the long term protection of sites, and land allocations should be reviewed regularly." According to Para. 2.17, the identified demand for housing is 8100 new homes by 2030. The Local Plan provides provision to create a minimum of 5000, therefore leaving a shortfall on the identified housing demand of 3100 homes. The Economic Growth Assessment (EGA) undertaken by the council to inform the Local Plan identifies 77ha of future requirement business use floorspace in Para. 5.10, and a baseline demand in employment growth of 16,500 jobs by 2031 in Para. 5.18. The Local Plan itself however, only proposes opportunities for 42ha of employment land in Policy EC1, leaving a shortfall on the requirement of 35ha.	Therefore due to the identified demand for Housing and Business Use sites within the Local Plan, and the shortfall on specific site allocations to meet this demand, Network Rail would request that if any sites in our ownership are put forward for either of these uses they would be looked on favourably by the council to enable Crawley Borough to meet its housing and employment targets. Network Rail would suggest that some of its Rail Stations within the borough would provide excellent opportunities to make up part of this shortfall which are discussed below.
REP/0047 (CSC2055791)	Mayfield Market Town	EC1	PLEASE SEE MAIN REPRESENTATIONS, INCLUDING SECTION 4, SECTION 6 AND REPORT 3: ECONOMIC GROWTH	PLEASE SEE MAIN REPRESENTATIONS SECTION 4 AND REPORT 3
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	EC1	This policy makes reference to a minimum amount of 35ha of land for business uses will be delivered over the term of the Local Plan. However, within the Infrastructure Plan, reference is made to the number of jobs provided.	The HA request that the quantum of employment is clarified.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/072 (CSC2055889)	Wilky Group	EC1	PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS 1. Introduction and summary 2. Gatwick Green economic study (Deloitte) 3. Demand and market assessment (GHK) 4. Alternative sites assessment 5. Regional policy context 6. Development concept 7. Access and movement strategy 8. Flood risk assessment 9. Environmental baseline and utilities report 10. Sustainability checklist and strategy 11. Outline response to sustainable community strategies 12. Employment generation and housing supply 13. Delivery statement - Gatwick Green: Transformation and Rebalancing the Local Economy (GHK, April 2011) - Delivering smart growth and additionally (Savills and GHK, June 2010) - The Gatwick Green Consortium Response to draft Gatwick Master Plan consultation (The Gatwick Green Consortium, January 2012) (Documents listed here are too large to attach so electronic copies are saved separately)	PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS
REP/014 (CSC2055634)	Chair Chris Maidment Crawley's Local Economy Action Group	EC1-EC9	Crawley's Local Economy Action group is supportive of the Crawley Submission Local Plan (2014) and as a strategic stakeholder and consultee supportive of the plan's approach to Chapter 5 on Economic Growth and policies EC1 to EC9. Crawley's Local Economy Action Group's Local Development Statement 2014, is attached in support of this representation.	
REP/045 (CSC2055422)	Mr. Ross McNulty	EC2	As proposed we do not believe Policy EC2 is justified in its entirety in so far as it relates to our client's site and the Hasletts Avenue area. As proposed it fails to reflect the changes that have occurred in the area and should be amended to reflect these local circumstances and recognise the opportunity for employment generating uses to come forward which will complement the predominately residential surrounding area.	Policy EC2 recognises the role that employment generating development can make to the specific character of main employment areas. It should also take full account of relevant market and economic signals and identify, in areas where more historic employment uses are no longer the predominate use, the type(s) of supporting development that might be appropriate.
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	EC2	Main Employment Area It is noted on the draft Proposals Map that the site remains part of the wider Main Employment Area allocation, as previously designated on the adopted Proposals Map (November 2007). The current draft allocation of the site is as part of an enlarged Main Employment Area bounded by Haslett Avenue East to the north and	To ensure maximum flexibility for this key site in coming forward for much-needed housing, we therefore recommend that draft Policy EC2 should be amended. The policy should be updated to include provision for the net loss of

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>by the railway tracks to the south and east (the Three Bridges Employment Corridor).</p> <p>At paragraph 5.31 of the Submission Local Plan, the Three Bridges Employment Corridor is acknowledged as a local small business location with residential uses surrounding and splitting the employment zone. Scottish Widows, whose portfolio was acquired by Aberdeen Asset Management, has owned the former TSB site since 1999 and it is no longer required for the use that it was originally intended. It is appreciated that there is a requirement to explore the feasibility and viability of re-providing some employment generating uses as part of any redevelopment proposals for the site. However, as there is little market demand or requirement for further employment floorspace at this location, the designation of the former TSB site as within a Main Employment Area is considered incongruous to its designation as a 'deliverable' Key Housing Site. The Proposals Map as drafted is therefore not justified and is unlikely to be effective.</p>	<p>employment floorspace to be considered acceptable on sites also designated for housing. This would include the addition of point (iv) within the current draft policy, as follows (proposed text in red and text to be deleted shown as struck through):</p> <p>Policy EC2: Economic Growth in Main Employment Areas As a key economic driver in the sub-region, Crawley's main employment areas make a significant contribution to the economy of the town and the wider area. Therefore, Main Employment Areas are identified as a focus for sustainable economic growth, each of which has a different character and function. Whilst identified as Main Employment Areas, Manor Royal, Gatwick Airport and the Town Centre perform a specific employment role which is recognised in individual location-specific Policies EC3, EC5 – 7, and GAT 1 – 4.</p> <p>The other Main Employment Areas are:</p> <ul style="list-style-type: none"> • Three Bridges Corridor (including Hazelwick Avenue) • Maidenbower Business Park • Tilgate Forest Business Centre • Broadfield Business Park • Lowfield Heath • Broadfield Stadium and K2 Crawley • The Hawth <p>Proposals for employment generating development at the six locations above will be supported where they contribute to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses. Proposals that would involve a net loss of employment floorspace will only be permitted where they are able to demonstrated that:</p>

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				<p>i) the site is no longer suitable, viable or appropriate for employment purposes; and</p> <p>ii) the loss of any floorspace will result in a wider social, environmental or economic benefits to the town; and</p> <p>iii) there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.; or</p> <p>iv) where the site is allocated as a Key Housing Site.</p>
REP/001 (CSC2055715)	Airport Industrial Property Unit Trust (AIPUT)	EC2	<p>Crawley Submission Local Plan - Policy EC2: Economic Growth in Main Employment Areas</p> <p>The Airport Industrial Property Unit Trust (AIPUT) owns an interest in a number of industrial and warehouse units at two locations on the southern side of Gatwick Airport, namely the Gatwick Gate Industrial Estate and Viking House. These units form part an area known as the Lowfield Heath Main Employment Area, which is identified on the Crawley Submission Local Plan Map as being located adjacent to the southern perimeter of Gatwick Airport. Some of the land within the Lowfield Heath Employment Area: including the Viking House Site, falls within the Gatwick Airport boundary as shown on the Crawley Submission Local Plan Map and also within the Gatwick Masterplan 2012. The Gatwick Masterplan 2012 identifies this land for ancillary activities required to support the operation of the Airport.</p> <p>Policy EC2: 'Economic Growth in Main Employment Areas' controls the future development of the main employment areas and states that employment generating development will be supported where it contributes to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses. The Policy goes on to state that proposals that would involve a net loss of employment floorspace will only be permitted where they are able to satisfy the following criteria:</p> <ol style="list-style-type: none"> 1. the site is no longer suitable, viable or appropriate for employment purposes; and 2. the loss of any floorspace will result in a wider social, environmental or economic benefits to the town; and 3. there is no adverse impact on the economic role or function of the main employment area, and wider economic function of Crawley. <p>While Policy EC2 is supportive of employment generating uses within the main employment areas; in respect of Lowfield Heath it does not recognise the proximity</p>	<p>We would recommend that an additional criterion is added to Policy EC2 so that it reads as follows: "Proposals that would involve a net loss of employment floorspace will only be permitted where they are able to demonstrate that:</p> <ol style="list-style-type: none"> 1. the site is no longer suitable, viable or appropriate for employment purposes; 2. in the case of Lowfield Heath the land is within the boundary of Gatwick Airport and/or identified within the Gatwick Masterplan 2012 for ancillary airport related activities and is required for such activities or other uses that require an on-airport location; 3. the loss of any floorspace will result in a wider social, environmental or economic benefit to the town; and 4. there is no adverse impact on the economic role or function of the main employment area, and wider economic function of Crawley." <p>We would also recommend that the fact that land within Lowfield Heath lies inside the Airport boundary and is identified within the Gatwick Masterplan 2012 for ancillary activities to support the operation of the Airport, is reflected in paragraph 5.33 of the Crawley Submission Local Plan.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			of this area to Gatwick Airport, the fact that land within it lies inside the Airport boundary or that this land is identified in the Gatwick Masterplan 2012 for ancillary activities required to support the operation of the Airport.	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport	EC2	<p>The Local Plan refers to Gatwick Airport as being a key employment location within the Borough and wider region. However, the Airport is only mentioned in passing within Policy EC2 as an employment location. The details of the Gatwick Airport policies are contained within GAT 1 - 4. Therefore, in our view, there is an opportunity to further promote the ability of Gatwick Airport to meet future employment needs within the general Employment section of the Plan.</p> <p>GAL strongly believes that the Airport has the potential capacity to meet wider employment needs than just airport related employment. This approach is already supported in the proposed wording in GAT4 and is wholly supported by GAL. However, there may be a greater opportunity not only to widen the range and nature of employment uses at the airport but also to assist with meeting CBC's needs to allocate additional employment space. It is considered that it may be possible to achieve this without affecting "the long term ability of the airport to meet the floorspace need necessary to meet the needs of the airport as it expands and will not have an unacceptable impact on the roles and function of Crawley Town Centre or Manor Royal" (as proposed by draft Policy GAT4). The airport is a highly sustainable location for employment floorspace. The diversification and intensification of the employment uses at the airport would benefit the airport and the wider Borough.</p> <p>Gatwick has significant advantages as an employment location. The space is already an allocated employment space on the basis that it falls within the airport boundary. Such employment space offers a highly sustainable location with easy access to central London and Brighton and more locally via local, regional and national train and bus networks. These transport networks will be improved significantly within the Plan period. New employment space is available and deliverable within the short term. Importantly its future is unaffected by either the continued operation of a single runway or potential future two-runway scenario. It is thus appropriate to consider identifying a broader range of employment opportunities with the Plan in addition to the B1, B2 & B8 Use Classes.</p>	<p>Recommended changes to Policy EC2</p> <p>The opportunity presented by this deliverable and available employment offer should be included in the Plan and considered not only in the GAT specific policies but also in the general Employment policies.</p> <p>Gatwick seeks the following changes to the following policies</p> <p>Draft Policy EC2</p> <p>GAL seeks that this policy and its associated supporting text should also acknowledge the potential employment role of sites within the airport boundary to contribute to employment land supply within the borough.</p> <p>It is proposed that the policy text is amended to read as follows:</p> <p>"whilst identified as Main Employment Areas, Manor Royal, Gatwick Airport (including sites within the airport boundary) and the Town Centre perform a specific employment role which is recognised in individual location-specific policies EC3, EC5-7, and GAT 1-4".</p> <p>It is suggested that the supporting text at paragraph 5.30 is also amended to reflect this change. It is recommended that the following wording is also included:</p> <p>"In some circumstances, it may be possible for land within the airport boundary to be brought forward for non-airport related employment uses. This could help to contribute to the supply of</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				employment land within the borough during the Plan period to 2030".
Rep/070 (CSC2055849)	Universities Superannuation Scheme	EC2	<p>USS partially supports and partially objects to Policy EC2. USS own Denvale Trade Park ('DTP') on Haslett Avenue (site ownership plan attached). The DTP borders the designated Town Centre Boundary covered by Policies EC5, EC6, EC7 and H2, but is not included in this area. We understand from discussions with the Council that DTP should be considered as 'out of centre', but Policies EC5, EC6, EC7 and H2 should still apply.</p> <p>The current policy wording and map show DTP as being part of the Main Employment Area which covers the rest of the town centre, however DTP is an established employment site and should be included in the Policy EM2 list of identified Main Employment Sites since this would be consistent with the policy map and current use.</p> <p>The policy states that proposals for employment generating development in the Main Employment Areas will be supported where they contribute to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses. USS supports the reference to 'employment generating uses', but requests that the text is amended to be more flexible in accordance with Paragraphs 14 and 17 of the NPPF. Suggested amendments are set out in box 7 below.</p> <p>In addition, the policy states that proposals that would involve a net loss of employment floorspace will only be permitted where they are able to demonstrate that (i). the site is no longer suitable, viable or appropriate for employment purposes; and (ii). the loss of any floorspace will result in a wider social, environmental or economic benefits to the town; and (iii). there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.</p> <p>The emerging Local Plan should adopt a more flexible approach to the management of employment land, which avoids the long term protection of employment sites that are no longer viable and promotes flexibility in the range of acceptable uses, in accordance with paragraphs 14, 17 and 22 of the NPPF. Please see box 7 for suggested amendments.</p>	<p>Policy EC2 should be amended to include Denvale Trade Park in the list of Main Employment Sites. The current policy wording and policy map is inconsistent and does not reflect DTP's current use.</p> <p>Policy EC2 should be amended to explicitly clarify that A1, A2, C1, D2 or sui generis uses are considered to be employment uses which can positively contribute to employment provision and that the reference to 'employment uses' is not restricted to just B uses. Denvale Trade Park's location adjacent to the town centre means that such uses could be appropriate and sustainable.</p> <p>The policy should recognise that alternative employment uses, such as hotels, can complement existing business functions and offer a higher density of employment opportunities than some B uses, such as warehousing. This more flexible approach would be compliant with Paragraphs 14 and 17 of the NPPF.</p> <p>USS requests that main employment areas in the district are not unreasonably safeguarded. The emerging Local Plan should adopt a flexible approach to the management of employment land, which avoids the long term protection of employment sites that are no longer viable and promotes flexibility in the range of acceptable uses, in accordance with paragraphs 14, 17 and 22 of the NPPF. This supports the reuse of brownfield in accordance with NPPF paragraph 111 which states that 'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/060 (CSC2052787)	Mr. Laurence Skinner	EC3	Consideration should be given to improving traffic jams at peak times along Manor Royal, the flyover, Gatwick Road and London Road, specifically at the roundabouts.	
REP/046 (CSC2054416)	Mr. Steve Sawyer MRBD Limited (The Manor Royal BID Company)	EC3	<p>MRBD agrees with this policy and welcomes the inclusion of Manor Royal Business District and the intention to build upon and protect its established role as a key business location supporting B Use Classes. In line with previous comments, we recognise the issue of limited land supply that has become more marked in recent months and likely to become more severe, as the EGA indicates. This situation is made worse by proposals by the Government to extend permitted development rights to allow permitted changes of use from B Class Uses to Residential. We feel strongly this undermines the core function and form of Manor Royal as a key employment location and that the Council should take steps to resist these changes, which are otherwise allowed to happen in an unplanned, piecemeal and opportunistic way.</p> <p>This might necessarily include considering an Article 4 Directive to introduce a level of managed control that is otherwise completely lost.</p> <p>We would also welcome consideration of how the Borough Council, working alongside and in partnership with the Manor Royal BID Company, might use available planning tools in a positive way to encourage the kind of economic growth and investment compatible with the current core function of Manor Royal - and as set out in the Manor Royal BID Plan and documents issued by the Council including the Manor Royal Masterplan - the vision for Manor Royal. We also recognise the ambition to achieve high quality design that contributes to a positive setting for business and staff.</p> <p>We would however encourage a pragmatic application of design standards so as not to make development onerous or unattractive to prospective developers / investors.</p> <p>We welcome paragraph 5.42 which reflects this sentiment although the definition of the term "unnecessarily" is subjective and therefore open to interpretation.</p> <p>Paragraph 5.39 We agree that B1 uses should be exempt from the sequential test and that a modern Manor Royal can and does accommodate office uses and is a good location for these uses.</p> <p>Paragraph 5.41 We would agree that County Oak is the most sensible location for locating out of town retail development as it complements existing uses at that location.</p>	Please refer to the attached Strategic Statement

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			<p>Consideration however should be given to the impact those non-retail businesses in the vicinity, particularly those located along County Oak Way and Metcalf Way, who already suffer at busy times from poor access into and out of the area that could be made worse by more intensive, traffic generating uses unless some other provision (e.g. another access road) is considered.</p> <p>In support of this policy and to make clear the issues, concerns and ambitions of MRBD Limited in respect of Land Use issues affecting the Manor Royal Business District we attach two documents for your consideration; (1) Our "Strategic Statement" issued originally in October 2013 and (2) our recent submission to the DCLG in response to their "Technical Consultation on Planning" that we feel is relevant. We would also draw the Council's attention to the Manor Royal BID Business Plan 2013-18 as a background document available on request and online at www.manorroyal.org</p>	
REP/046 (CSC2054416)	Mr. Steve Sawyer MRBD Limited (The Manor Royal BID Company)	EC3	Attached is our response to DCLG "Technical Consultation on Planning"	Document attached setting out our position on permitted development.
REP/046 (CSC2054416)	Mr. Steve Sawyer MRBD Limited (The Manor Royal BID Company)	EC3	<p>MRBD Limited defines the geographical area of the Manor Royal Business District differently from the area indicated in the Local Plan and on the Local Plan Map. While this may not make the plan "unsound" we regard the north-eastern boundary of Manor Royal to be marked by the roads James Watt Way and Steers Lane. We regard City Place as having a separate and distinctive brand, look and feel quite apart from that of the Business District.</p> <p>We feel it would be beneficial to make this distinction clear and to define these areas separately in the same way that Lowfield Heath is defined separately. In the Manor Royal Masterplan (GVA, 2010) City Place - and County Oak - are referred to as "fringe areas" to the core area.</p>	Make the area City Place distinct from the core area that is regarded as the Manor Royal Business District, which is bounded by James Watt Way and Steers Lane.
REP/051 (CSC2055590)	Mr. David Payne Mineral Products Association (MPA)	EC3	Para 143 of the NPPF requires local plans to safeguard existing, planned and potential storage, handling and processing facilities for bulk transport [of minerals] by rail... and existing, planned and potential sites for concrete batching, manufacture of coated materials, other concrete products and the handling, processing and distribution of recycled and secondary aggregate material.	The Map should identify the safeguarded Crawley Goods Yard (as identified in the West Sussex Minerals Local Plan).
REP/016 (CSC2055613)	Mrs. Samantha Clark Canadian & Portland Estates plc.	EC3	The principle in the third paragraph of Policy EC3 that proposals that are not for B use class development will be permitted at Manor Royal is supported. However, the requirement that such proposals should demonstrate that they are of a scale and function that enhances the established role and business function of Manor Royal is considered unduly onerous and it should be sufficient for such proposals only to be	The third paragraph of Policy EC3 should be revised to read: 'Proposals that are not for B Use Class development will be permitted at Manor Royal if it can be demonstrated that they are of a scale and function that is compatible with the

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			compatible with the established role and business function. In this way the established role and business function would be protected and the change would also enable the policy to be more flexible to accommodate changes in development needs over the plan period.	established role and business function of Manor Royal and would not undermine the business district.'
REP/079 (CSC2055699)	Homes and Communities Agency	EC3	Policy EC3: Manor Royal 3.6 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 Local Plan and text within the Reasoned Justification section. The future potential of the wider area should be highlighted should plans for a second runway at Gatwick not come forward, which presents a real possibility within the plan period. Notwithstanding the above comment, the HCA consider this policy to be sound.	
REP/055 (CSC2055721)	T&L Crawley LLP Rappleys	EC3	We support the policy objective in principle for Manor Royal Business District to secure its economic function and role and the policy's support for non B use class development in Manor Royal. However, we object to some aspects of Policy EC3, which is expressed in separate forms and in detail in the accompanying letter of representations.	N/A
REP/067 (CSC2055754)	Travis Perkins (Properties) Limited, Travis Perkins Plc.	EC3	Travis Perkins (Properties) Limited ('TP') is the property division of Travis Perkins Plc. Travis Perkins is the UK's largest supplier to the building and construction market, one of the most economically significant activities in the UK. The company provides building supplies and materials to the trade and to the public, from a network of branches across the UK, based upon four trading divisions:- 1. The general merchandising division which trades nationally through the builders merchants that bears the company name, supplying building materials to professional building companies, contractors and tradesmen throughout Great Britain. Such uses are considered to be sui generis in planning terms albeit that builders merchants are considered akin to a Class B use, and commonly found on business parks or industrial estates. 2. The specialist merchandising business consists of businesses such as CCF (interior building products) and Benchmarx (kitchen and joinery products). These businesses also almost exclusively serve trade customers and are considered Class B uses. 3. The consumer division which comprises Wickes, Tile Giant (ceramic tiles) and Toolstation. Wickes stores are designed to appeal to tradesmen who undertake general repairs, maintenance and improvement projects for households and small businesses, and to serious DIY customers, who undertake more complete DIY projects. It has been recognised as performing a mixed Class B8/A1 function. 4. Plumbing and heating which comprises City Plumbing Supplies and the BSS Group, and are again Class B uses.	Accordingly, TP supports the objectives of the policy which are based upon a positive economic vision for Manor Royal to secure economic growth and create jobs and prosperity. However, the success of the policy will be based upon the ability of the policy to facilitate a diverse range of business types to produce strong economic growth, and not to be unduly restrictive about the enterprises which should locate there. Accordingly, TP considers that the supporting text to the policy should explain the factors that collectively define the economic role and function of the area. These are considered to include:- <ul style="list-style-type: none"> • Accommodating expanding businesses; • Diversifying and intensifying the range of businesses and jobs; • Enhancing the quality and attractiveness of sites, buildings and related landscaping; • Providing accommodation that is flexible to the needs of a variety of business users to create a vibrant area for the widest range of businesses to flourish.

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			<p>Travis Perkins property development programme is now based, where possible, upon providing a 'Group Facility' that provide outlets for two or more of the above divisions on a single site in order to provide a wide range of general and specialist building supplies and materials in one location. The company is in discussion with a company who owns a site at Manor Royal which would be suitable for a Group Facility. Accordingly, TP is interested in the emerging planning policy EC3 in respect of development at Manor Royal.</p> <p>National Planning Policy Framework At the heart of the NPPF is a presumption in favour of sustainable development - golden thread running through plan-making. This requires LPA's to positively seek opportunities to meet the development needs of their area, based upon an objective assessment of needs, and flexibility to adapt to future change. Building a strong and competitive economy is an important element to delivering sustainable development. The Government is committed to securing economic growth (through the planning system) in order to create jobs and prosperity, to encourage and not impede sustainable growth. Significant weight should be placed on the need to support economic growth through the planning system.to meet the development needs of business.</p> <p>Local Plans should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.</p> <p>The Crawley Borough Local Plan 2015 - 2030 Chapter 5 Concerns Economic Growth. Based upon forecasts that Crawley's economy will grow significantly during the Local Plan period, the policy sets out a vision that promotes a strong and competitive economy, based upon Crawley being a key economic driver in the sub-region. Accordingly, the policy framework is to promote the continued economic growth of the town so that it prospers as an employment destination both locally, and as part of the wider Gatwick Diamond. Policy EC3 is based upon a recognition that The Manor Royal Business District is recognised to be the principal business location for Crawley, and instrumental to success of the wider Gatwick Diamond. It is based upon two principal limbs:-</p> <ul style="list-style-type: none"> • Development that falls within the B Use Class, and would result in the reuse, intensification, or change of use of the land or buildings, will be permitted where it is compatible with the area's economic function and role in the wider sub-region; and • Non-Class B uses will be permitted if it can be demonstrated that they are of a scale and function that enhances the established role and business function of Manor Royal and would not undermine the business district. 	<p>Conclusion TP supports the vision set out in Policy EC3, but considers that the supporting text should provide more detail on how this will be achieved.</p>

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			<p>The final element of the policy promotes development that positively contributes to the overall setting and environment of Manor Royal through high quality design and landscaping.</p> <p>Assessment As noted above, elements of the TP Group Facilities are Class B uses, and other elements are non-Class B uses. Therefore both of the policy limbs, indented above, are relevant to TP.</p> <p>TP acknowledges the role of Manor Royal as the principal business location for Crawley. It considers that the economic role and function of the area is based upon facilitating a wide range of businesses including office, industrial and warehousing uses, along with other business uses such as hotels, car showrooms and certain retail uses that are generally related to other Class B activities (e.g. Evans Cycles and Avensys).</p>	
REP/046 (CSC2054416)	Mr. Steve Sawyer MRBD Limited (The Manor Royal BID Company)	EC4	<p>MRBD Limited understands the need to ensure that the development, redevelopment of change of use of employment areas is compatible with near by residential areas to protect the quality of life of those residents.</p> <p>The Manor Royal Buffer Zones are in place to serve this purpose and to our knowledge have not adversely impacted on investment in those areas. It is important that this continues to be the case and that the right balance is made between supporting economic growth and protecting residents interests. Our concern relates to the recent trend for commercial buildings and the proposed extension of this permitted change for use of these buildings for housing. We do not welcome this permitted change and, where it has been or might be allowed to happen, would not support new, additional or extended buffer zones to be created in Manor Royal.</p> <p>We feel paragraph 5.46 could be stronger on this and it's current wording seems to imply that changes of use allowed by the Prior Approval process may mean the introduction of more buffer zones that would be detrimental to the economic function of the area if this were to be allowed to happen.</p>	Words to the affect that should such changes be allowed by the Prior Approval process in Manor Royal Business District that the Council would preferentially not seek to introduce buffer zones that might otherwise inhibit the proper function of the Business District as a key employment area.
REP/051 (CSC2055590)	Mr. David Payne Mineral Products Association (MPA)	EC4	<p>We support the policy but recommend that the policy should be strengthened to reflect the text in paragraph 5.44 and provide sufficient safeguarding of Crawley Goods Yard and so be consistent with NPPF and West Sussex Minerals Local Plan.</p>	Amend policy to make reference to the need to protect the economic function of the Main Employment Area so as ongoing operation and growth of businesses are not negatively impacted or prejudiced by inappropriate development in proximity.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/079 (CSC2055699)	Homes and Communities Agency	EC4	<p>Policy EC4: Employment Development and Residential Amenity</p> <p>3.7 Comment - HCA notes the policy aim to reduce the potential conflict between neighbouring land uses that can arise through new development, specifically for the HCA this is relevant to their site at Tinsley Lane which borders the Goods Yard, a safeguarded waste processing site.</p> <p>The HCA support the principle of the NPPF which are echoed in the plan which seek to take a positive approach to addressing amenity issues in delivering future residential development that does not impact on either residential amenity of the future potential of safeguarded waste sites, by reducing their future expansion potential. This approach is consistent with the approach set out in the NPPF and is considered sound.</p>	
REP/015 (CSC2055717)	CEMEX UK Operations Ltd.	EC4	<p>Policy EC4 seeks to ensure that employment development adjacent to residential areas protects residential amenity. Paragraphs 5.44 - 5.46 provide the supporting text and additionally states that residential development in and adjacent to employment land should not negatively impact on the economic function of that land. More specifically, Paragraph 5.44 states that: 'Equally, it is recognised that the Main Employment Areas represent the key focus for economic development in Crawley. Therefore, where residential development is proposed within or adjacent to Main Employment Areas, the principle concern is to ensure that the economic function of the Main Employment Area is not constrained or negatively impacted upon by inappropriate development' Ensuring that the existing businesses are not impacted on from residential development is essential. This approach is supported by the NPPF which recognises the importance of safeguarding existing railheads and sets out that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. This approach is supported by CEMEX UK Operations Ltd. but in order for the Policy to be sound the approach must be strengthened and incorporated into the text of Policy EC4 rather than just referenced in supporting text.</p>	<p>The following text should be Policy not just supporting text: 'Equally, where residential development is proposed within or adjacent to Main Employment Areas, the principle concern will be to ensure that the economic function of the Main Employment Area is not constrained or negatively impacted on by inappropriate development'</p>
REP/002 (CSC2055736)	Aggregate Industries UK Limited	EC4	<p>Policy EC4 seeks to ensure that employment development adjacent to residential areas protects residential amenity. Paragraphs 5.44 - 5.46 provide the supporting text and additionally states that residential development in and adjacent to employment land should not negatively impact on the economic function of that land. More specifically, Paragraph 5.44 states that: 'Equally, it is recognised that the Main Employment Areas represent the key focus for economic development in Crawley. Therefore, where residential development is proposed within or adjacent to Main Employment Areas, the principle concern is to ensure that the economic function of the Main Employment Area is not constrained or negatively impacted upon by inappropriate development' Ensuring that the existing businesses are not impacted on from residential development is essential.</p> <p>This approach is supported by the NPPF which recognises the importance of safeguarding existing railheads and sets out that existing businesses should not</p>	<p>The following text should be policy, not just supporting text: 'Equally, where residential development is proposed within or adjacent to Main Employment Areas, the principle concern will be to ensure that the economic function of the Main Employment Area is not constrained or negatively impacted upon by inappropriate development'.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>This approach is supported by Aggregate Industries but in order for the Policy to be sound the approach must be strengthened and incorporated into the text of Policy EC4 rather than just referenced in supporting text.</p>	
REP/ 022 (CSC2056817)	Day Group Ltd Ms Kate Matthews	EC4	<p>Policy EC4 seeks to ensure that employment development adjacent to residential areas protects residential amenity. Paragraphs 5.44 5.46 provide the supporting text and additionally recognise that residential development in and adjacent to employment land should not negatively impact on the economic function of that land. More specifically, Paragraph 5.44 states that: 'Equally, it is recognised that the Main Employment Areas represent the key focus for economic development in Crawley. Therefore, where residential development is proposed within or adjacent to Main Employment Areas, the principle concern is to ensure that the economic function of the Main Employment Area is not constrained or negatively impacted upon by inappropriate development'</p> <p>Ensuring that the existing businesses are not impacted on from residential Development is essential. This approach is supported by the NPPF which recognises the importance of safeguarding existing railheads and sets out that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>This approach is supported by Day Group Ltd but in order for the Policy to be sound the approach must be strengthened and incorporated into Policy EC4 rather than just referenced in supporting text.</p>	The following text should be Policy not just supporting text: 'Equally, where residential development is proposed within or adjacent to Main Employment Areas, the principle concern will be to ensure that the economic function of the Main Employment Area is not constrained or negatively impacted on by inappropriate development'
REP/060 (CSC2052787)	Mr. Laurence Skinner	EC5	<p>Consideration should be given to providing adequate free parking close to the town centre to encourage people to shop in town rather than in out of town shopping centres where free parking is available.</p>	
REP/060 (CSC2052787)	Mr. Laurence Skinner	EC5	<p>Consideration should be given to building "Park and Ride" facilities to enable people to get into the town centre for free and reduce traffic.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/066 (CSC2055283)	Mr. Mark Mathews Thames Water Utilities Ltd.	EC5	<p>Thames Water do not object to the policy in principle, but seeks that grease traps are installed in all catering establishments. These traps must be regularly cleaned and maintained. Failure to enforce the effective use of grease traps will result in the build-up of food deposits and grease in sewers and drains. This can cause blockages and flooding resulting in emergency cleaning. These food deposits may also encourage the migration of rodents into the wastewater infrastructure and encourage their proliferation.</p>	Include reference to the need to install grease traps in new catering establishments.
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	EC5	<p>We acknowledge the role of Crawley as a sub-regional retail destination. At the same time, Redhill is recognised as a strategic centre of significance in the retail hierarchy. It is therefore important that proposals for the two town centres are complementary.</p> <p>RBBC is committed to working with CBC to ensure that a coordinated approach to retail provision can be taken where both Crawley and Redhill can fulfil their respective roles. RBBC had previously made representations to CBC that the original scale of growth planned for Crawley Town Centre (through the Town Centre North development) could have a significant impact on proposals for retail/regeneration plans for Redhill, and expressed concerns about the conclusion of the 2010 Retail Capacity and Impact Study that an impact of 6.1% on Redhill was 'insignificant'.</p> <p>We note from the latest Retail Capacity Study Update (2013) that the latest proposals for sites in the north of the Town Centre anticipate a smaller quantum of comparison floorspace, and the conclusion that there is therefore no need to undertake detailed testing of the likely impact on surrounding town centres as the impact of a larger scheme has been fully tested.</p> <p>There does not, however, appear to be any information in the Local Plan about the quantum of retail (comparison) growth proposed for Crawley town centre or any information about the phasing of new development.</p> <p>We support the principle of the growth of Crawley Town Centre, subject to this being of a scale that allows the potential of Redhill to also be fulfilled.</p> <p>This principle has been agreed through the Gatwick Diamond Local Strategic Statement (2012) which identifies that 'the scale of growth in Crawley should not be such as to prevent other town centres from continuing to play an effective role for their local communities'.</p> <p>Without an identified quantum of growth set out in Local Plan policy, or phasing information, we cannot be certain that proposals for retail growth in Redhill and Crawley are complementary, or that this shared objective will be realised.</p>	<p>Inclusion of information in policy about the total quantum of retail growth proposed ('up to xxxsqm') for Crawley Town Centre, supported, if required, by evidence demonstrating that proposals will not have a significant impact on nearby town centres such as Redhill. This will provide certainty about the planned level of growth, and limit the risk that further amendments to proposals for Crawley town centre (for example a revived Town Centre North scheme) will have a negative impact on proposals for nearby town centres.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/079 (CSC2055699)	Homes and Communities Agency	EC5	Policy EC5: Town Centre Uses 3.8 Support - The HCA fully support the principles of Policy EC5 in progressing the redevelopment and enhancement of the town centre to provide a key retail destination and a town of sub-regional significance. The HCA has a number of individual landholdings which forms key public areas in the Town Centre, most notably the land surrounding the Boulevard and Queensway. The HCA support CBC objectives to see the wider redevelopment of these areas to increase the overall appeal of Crawley as a destination and increase the vitality and viability of the centre as a whole. The HCA consider this policy to be justified and effective and therefore believe the policy to be sound.	
REP/033 (CSC2055843)	Horsham DC	EC5	Town Centres: We note that an objective of the plan is to promote Crawley's vitality and viability as a sub-regional retail centre. The town centre first approach to retail development in the Borough is noted. 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, such as Horsham, perform. We welcome ongoing discussions about the complementary and supportive role of Horsham town centre.	
REP/044 (CSC2055475)	Miss Kim McGregor Moat Housing	EC6	We support the delivery of Town Centre sites and specifically in relation to Telford Place which I believe is a deliverable residential scheme of 156+ units following extensive pre application discussions and positive discussions with the Highways Department. Furthermore, our own Market Intelligence demonstrates unmet private and affordable housing need in the town centre.	
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	EC6	The HA is broadly supportive of this policy that supports the NPPF principles of encouraging mixed-use town centre or edge-of-centre sites due to them potentially being more sustainable than out of town sites.	
REP/054 (CSC2055476)	Reigate and Banstead Borough Council	EC6	We acknowledge the role of Crawley as a subregional retail destination. At the same time, Redhill is recognised as a strategic centre of significance in the retail hierarchy. It is therefore important that proposals for the two town centres are complementary. RBBC is committed to working with CBC to ensure that a coordinated approach to retail provision can be taken where both Crawley and Redhill can fulfil their respective roles. RBBC had previously made representations to CBC that the original scale of growth planned for Crawley Town Centre (through the Town Centre North development) could have a significant impact on proposals for retail/regeneration plans for Redhill, and expressed concerns about the	Inclusion of information in policy about the total quantum of retail growth proposed ('up to xxxsqm') for Crawley Town Centre, supported, if required, by evidence demonstrating that proposals will not have a significant impact on nearby town centres such as Redhill. This will provide certainty about the planned level of growth, and limit the risk that further amendments to proposals for Crawley town centre (for example a revived Town Centre North

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>conclusion of the 2010 Retail Capacity and Impact Study that an impact of 6.1% on Redhill was 'insignificant'.</p> <p>We note from the latest Retail Capacity Study Update (2013) that the latest proposals for sites in the north of the Town Centre anticipate a smaller quantum of comparison floorspace, and the conclusion that there is therefore no need to undertake detailed testing of the likely impact on surrounding town centres as the impact of a larger scheme has been fully tested. There does not, however, appear to be any information in the Local Plan about the quantum of retail (comparison) growth proposed for Crawley town centre or any information about the phasing of new development.</p> <p>We support the principle of the growth of Crawley Town Centre, subject to this being of a scale that allows the potential of Redhill to also be fulfilled. This principle has been agreed through the Gatwick Diamond Local Strategic Statement (2012) which identifies that 'the scale of growth in Crawley should not be such as to prevent other town centres from continuing to play an effective role for their local communities'.</p> <p>Without an identified quantum of growth set out in Local Plan policy, or phasing information, we cannot be certain that proposals for retail growth in Redhill and Crawley are complementary, or that this shared objective will be realised</p>	<p>scheme) will have a negative impact on proposals for nearby town centres</p> <p>.</p>
REP/055 (CSC2055721)	T&L Crawley LLP Rapleys	EC7	<p>Policy EC7: Retail and Leisure Development Outside the Primary Shopping Area Whilst we support the policy in principle, we object to some aspects/wording of the policy.</p> <p>Criterion a) of the second paragraph of the policy refers to 'the need for the development' in the application of the sequential test. As National Planning Practice Guidance (NPPG) confirms, the need of development is not a factor that is relevant in the application of the sequential test for decision-making. We consider that the criterion should be amended for clarity.</p>	<p>Suggested amended to criterion a) of Policy EC7</p> <p>"the need for proposed development cannot be met on more central sites, having applied the sequential test;"</p> <p>The last paragraph of Policy EC7 confirms County Oak's established retail warehouse function, and advises that it should remain the focus for any out of town retail proposals. As noted above, the County Oak area's retail function serves more than retail warehousing provision by the virtue of the consented retail development at the Betts Way site. As such, we consider that this paragraph should be amended.</p> <p>Suggested amendments to the last paragraph of Policy EC7:</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>“The existing and committed out of centre retail locations at County Oak (including the Betts Way site) and London Road Retail Park have an established and ongoing retail warehouse function and should remain the focus for any out of centre town retail</p> <p>proposals, subject to satisfying the sequential assessment and impact testing as outlined above.”</p> <p>With regard to “reasoned justifications” for Policy EC7, whilst it follows the NPPF’s town centre first approach in the application of the sequential and impact tests for out of centre retail development, they do not reflect the NPPG which advises that the application of:</p> <ul style="list-style-type: none"> • The sequential test “should be proportionate and appropriate for the given proposal,” <p>And</p> <ul style="list-style-type: none"> <input type="checkbox"/> The impact test “should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.” <p>For out of centre sites, such as Betts Way, which benefits from extant retail consent, the retail tests for any reworking of the consent should be applied proportionately and appropriately taking into account the extant retail consent, which is a “commitment.” We consider that these factors should be incorporated in the policy in order to ensure that the Local Plan gives a clear guide to applicants. Accordingly, we request that paragraphs 5.60 and 5.62 are amended.</p> <p>Suggested amendments to paragraphs 5.60 and 5.62</p> <p>“...as per the NPPF sequential approach, if development proposals cannot be located within the town centre, edge-of-centre locations should be investigated, and only if suitable sites are not available should out-of-centre sites be considered. The application of the test will be proportionate and appropriate for the proposed scheme and informed</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>by the site's planning history/authorised use. The NPPF is clear in outlining that the proposals for main town centre uses....” (Paragraph 5.60)</p> <p>“...applications should be accompanied by a detailed retail impact assessment to demonstrate that the proposal is acceptable in impact terms, making clear how the proposed out-of-centre retail offer would complement, rather than complete with, the current/future town centre offer. The impact assessment should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible, including the planning history of any given site.” (Paragraph 5.62)</p>

Housing

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council	H1	MVDC recognises the positive outcome from a cooperative approach to meeting housing needs, involving joint working with Horsham, Mid Sussex and Reigate and Banstead Borough Council. MVDC agrees that these are the most appropriate locations for urban extensions to meet identified housing needs (see also MVDC's response to the Duty to Cooperate Statement for the Crawley Borough Local Plan 2015-2030, August 2014).	
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	H1	<p>We note that Crawley Borough Council has concluded that it is unable to meet its objectively assessed housing needs, and can confirm that CBC have engaged with Reigate & Banstead in respect of this issue.</p> <p>Whilst we do not consider the plan itself to be unsound, we have some comments about the evidence base.</p> <p>Local Housing Market Areas: Reigate & Banstead falls within the East Surrey Housing Market Area, although the presence of London 'on the doorstep' has an impact on movements across the wider area. This is confirmed by work by DCLG which suggests that the borough falls within the wider London HMA and the local London (South West) HMA: the Crawley HMA sits to the south of Reigate & Banstead Borough, although there are some localised movements between the southern part of the borough and Crawley.</p> <p>Housing supply in Reigate & Banstead: The Reigate & Banstead Core Strategy was examined in 2013. At the examination it was recognised that, whilst the borough was able to provide sufficient housing to meet the full need arising from within the local population, it was not able to fully meet its objectively assessed housing needs taking into account in-migration pressures (even allowing for release of Green Belt land for development). As such RBBC is committed to working closely with other authorities (including those within the East Surrey HMA and North West Sussex HMA) to understand the extent to which housing needs across the area can be met and to secure the delivery of much needed new homes.</p> <p>Migration into RBBC: Cooperation between RBBC and CBC resulted in clarification in our Core Strategy that our housing figure does allow for some continuing in-migration from other local authorities, including those within East Surrey and North West Sussex. Our Core Strategy does not however, make specific (quantified) allowances for in-migration from individual boroughs. This is due to the complexities of the housing market area for</p>	Whilst we do not seek changes to the Local Plan as submitted, we would not support the inclusion of a quantified proportion of the Reigate & Banstead housing target 'allocated' to meet Crawley's needs as in reality this would not be achievable, and the suggested figure may not be realistic taking into account migration pressures into Reigate & Banstead from, for example, London.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			Reigate & Banstead and the inability to control where those who purchase market housing in the borough originate from. We note the figure of 50 dwellings per year identified in the Unmet Needs Topic Paper, however this is not derived from our own policy or evidence base.	
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Village Conservation Area Advisory Committee		This section gives a comprehensive analysis of the housing challenges that face Crawley at the present time based on clear sets of evidence. It provides detailed information about what housing can come forward in the near future and where help is to be sought from other authorities nearby.	
REP/066 (CSC2055283)	Mr. Mark Mathews Thames Water Utilities Ltd.	H1	<p>The information contained within the Local Plan Consultation is of significant value to Thames Water as they prepare for the provision of future infrastructure; however the level of information contained does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on local infrastructure.</p> <p>To enable Thames Water to provide more specific comments on the site proposals we would value the inclusion of the Council's aspiration for each site. For example, in addition to an indication of the type and scale of development also the anticipated timing/phasing of development. As a general comment, the impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We would therefore support a policy that considers brownfield sites before greenfield sites. We also wish to highlight the opportunity to introduce sustainable urban drainage systems into brownfield development to reduce surface water flows into the sewers. It is important to maximise capacity in the sewers for foul sewage thus reducing the risk of sewer flooding. Thames Water seeks to encourage developers to contact the Developer Services department early to discuss proposals. As per the comments relating to Policy IN.1, developers may be required to fund studies to determine network capacity, and in some circumstances fund upgrades to the network. It is also important not to underestimate the time required to deliver necessary infrastructure, for example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p>	
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	H1	<p>We support the principle of housing growth in the area and the Council's assertion that proposals for the provision of housing will be positively considered.</p> <p>We support the consideration of all reasonable opportunities for new housing to be considered as stated, and would encourage the optimisation of sites for the provision of new housing where they can be demonstrated to be sustainable.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>Housing Delivery</p> <p>We support the identification of the former TSB site as a 'deliverable housing site', expected to come forward within the first five years of the Plan (2015/16 – 2019/20). We consider this timescale for delivery to be wholly realistic and in the spirit of being positively prepared, as sought by the</p> <p>As set out above, the site previously had planning permission alongside the SEEboard site for 270 residential units. We submit that there remains potential for the site to be brought forward for the delivery of housing both as a standalone site, and alongside its neighbours as part of a more comprehensive masterplan for the wider area.</p> <p>The ability of the site to come forward as part of a wider masterplan should be encouraged where it would enable a greater quality and density of development to be delivered alongside an appropriate package of other planning benefits. However, this should not prejudice the ability of the former TSB site to be brought forward on a standalone basis where other landowners are not ready / able to bring forward development.</p>	
REP/028 (CSC2055588)	Mr. Craig Barnes Gladman Developments	H1	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/030 (CSC2055631)	Mr. C. Heymann DPDS Consulting	H1	The uncertainty surrounding the expansion of Gatwick Airport means that certain sites need to be treated with a degree of flexibility to ensure that they are deliverable in the future, whatever the Governments final decision. The information set out below refers to a particular site where such a flexible land use allocation strategy should be adopted.	The Local Plan currently identifies a site located between Steers Lane, Balcombe Road and Radford Road as part of the north east sector for housing development (Policy H2), however whilst this allocation is welcomed by the land owner and which he wishes to see retained within the Local Plan, there also needs to be recognition that a potential second runway at Gatwick Airport would subsequently blight the site for residential development due to noise implications due to the site sitting adjacent to the airport safeguarding zone (Policy GAT2). In the scenario that Gatwick Airport becomes the Governments preferred option for expansion, the potential for airport use or airport compatible uses should be recognised and kept as an option in order to adopt a realistic and pragmatic approach to delivery of development on the site. Obviously should Gatwick Airports current bid fail then the sites residential potential would be realised. Our clients have discussed such proposals with members of Gatwick Airports

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>expansion bid team, who agree with this approach as they would not wish to see applications made for residential development in such close proximity to an expanded airport for obvious reasons.</p> <p>Our client wishes to work collaboratively with key stakeholders within the local area and it is considered this flexible approach to land use allocation on this site would future proof the plan and allow for such circumstances to be taken into consideration in the compilation of housing delivery figures within the Borough.</p> <p>DPDS would be happy to elaborate the above information if required however at this time on behalf of our client respectfully request that the Local Plan Map and appropriate policies are modified to take into consideration the scenario set out above and so to ensure that the Local Plan is sound in terms of deliverability and not out of date as soon as it is adopted.</p>
REP/012 (CSC2055687)	Bupa Care Services	H1	<p>Is the evidence base sound and legally compliant?</p> <p>We have reviewed the evidence base which sits behind the DLP and consider that it does not correctly identify housing need in the Borough. We consider that the Council has significantly underestimated housing need. Local Plans should be based on a comprehensive strategy which seeks to meet objectively assessed need (OAN) both in terms of development need and infrastructure requirements. Objectively assessed housing need (OAHN) has been assessed in the Borough via two evidence base documents: the Locally Generated Housing Needs Assessment 2011 (LGHNA) and the North West Sussex SHMA 2012 (2012 SHMA). Both of these documents look to assess housing need using a demographic baseline scenario, which broadly accords with guidance in the NPPG which requires that the use of population projections and related CLG household projections should form the starting point for assessments.</p> <p>The LGHNA and 2012 SHMA identify a need for 8,100 dwellings in Crawley over the plan period (which equates to 542 dpa). We do have some in principle concerns that these assessments have been carried out with reference to the ONS 2008-based Sub National Population Projections, rather than the DCLG 2011 Interim Household Projections advocated by the NPPG. However, the 2011DCLG Projections also largely support the 8,100 figure, which suggests that it is a relatively robust starting point for determining OAHN. However, the 8,100 figure should only be treated as a starting point and we do have concerns as to whether this figure actually constitutes OAHN.</p>	<p>Policy H1 'Housing Provision'</p> <p>As detailed above, we do not consider that housing need has been correctly assessed, and as such do not agree that the correct housing provision has been identified.</p> <p>As an absolute minimum the housing target should be set at 8,100 over the plan period, though the figure that more accurately reflects OAN is 9,960.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>One concern in this regard is that none of the Council's assessments have taken into consideration the need to provide for some of London's unmet need.</p> <p>Short term migration trends (contained in the LGHNA) indicate that there has been high inward migration levels to Crawley from London and indeed has remained consistently strong. A recent report by Nathaniel Lichfield and Partners indicated that London's unmet housing is between 7,000 - 20,000 a year (depending on when the backlog is addressed) and stated that all Borough's with inward migration from London need to take a proportionate account of this trend. With this in mind it is considered that a figure more akin to Scenario D in the LGHNA, which takes into consideration inward migration levels, is the most accurate assessment of what OAHN in the Borough - namely 664 dpa or 9,960 dwellings over the plan period.</p> <p>As will be detailed in the following section of this letter, we also do not believe that the Council are fully considering their obligation to help meet unmet housing need for other Borough's within their Housing Market Area (HMA). 8,100 dwellings would also not address any existing backlog in housing provision in the Borough, nor would it fully address affordable housing need. Yet despite evidence of housing need being at least 8,100 dwellings over the plan period, if not considerably higher, the Council have adopted a figure of 4,895 dwellings in Policy H1. This equates to a mere 326dpa and comes directly from the supply that the Council have identified in their SHLAA. Therefore, it is merely a supply led figure that does not seek to meet OAHN in any way.</p> <p>Affordable housing need alone in the Borough is 382dpa; and the Council has only managed to deliver 409 dwellings since 2011 (202 -2011/12; 85 - 2012/13; and 122 in 2013/14), which is significantly below currently adopted delivery targets. The Council are currently using the West Sussex Structure Plan targets for delivering housing, which expires in 2016. Against structure plan targets the Council have a current shortfall of 455 dwellings. There is no evidence that their supply-base target in DLP Policy H2 accounts for this. It is clear therefore that 4,895 dwellings is a woefully low figure, well below actual housing need. It also does not take into account the need to provide for a 5% or 20% buffer, as cited in paragraph 47 of the NPPF. Given Crawley's persistent under delivery, there is a case that they should be providing 20% over OAN.</p> <p>Regardless of the constraints that the Council believes it is subject to, which in its view justifies such a low housing target, it is not nearly as constrained as some of the Green Belt Authorities in the South East, who arguably are at least attempting to grapple with the issue in a much more pragmatic manner. Indeed, the NPPG makes it clear that it is not appropriate to use constraints as a mechanism for artificially lowering the housing requirement and supply. It is made quite clear in Government guidance (NPPF and NPPG) that a supply led housing figure is not supported by the Government; rather the</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>Government considers that demographic trends should always be the starting point for identifying housing supply.</p> <p>On this basis we do not think that the Council has a) properly assessed OAHN, which is required for its plan to be found sound and b) it is not setting an NPPF compliant housing target.</p> <p>We therefore consider that the DLP is unsound because it does not satisfactorily identify the Borough's housing need, nor does it provide a satisfactory resolution to the problem of unmet housing need in the Borough.</p>	
REP/079 (CSC2055699)	Homes and Communities Agency	H1	<p>Policy H1: Housing Provision</p> <p>Housing policies and NPPF compliance</p> <p>3.9 The Presumption in Favour of Sustainable Development (PFSD) is the 'golden thread' which should run through a local plan. The approach to a local plan, its vision and proposals should be expressed in policies which are justified and effective in accordance with the NPPF. The plan needs to be positively prepared. CBC should prepare a strategy which meets objectively assessed development needs, particularly housing.</p> <p>3.10 The NPPF sets out the Government's current and future requirements for boosting significantly the supply of housing (in the drive for economic growth) - including the identification of a supply of specific, developable sites sufficient to provide five years worth of housing against local housing requirements and of specific, deliverable sites or broad locations for growth for years 6-10 and if possible for years 11-15.</p> <p>3.11 NPPF paragraph 7 indicates priority towards 'providing the supply of housing required to meet the needs of present and future generations' and 'widening the choice of high quality homes' (paragraph 9). There are various references to housing needs throughout the document. Importantly, though, paragraph 159 indicates that SHMAs should cater for housing demand, as well as need.</p> <p>3.12 The Local Plan has been amended in this respect since the Preferred Strategy Consultation to address what was considered an underestimation of the housing demand and need over the plan period. The annual housing figures have now been increased in light of a further review of the evidence base documents, notably the 'Locally Generated Housing Needs Assessment'. As such the HCA now consider that the identified housing delivery over the plan period is based upon a 'mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community' in accordance with NPPF paragraph 50.</p> <p>3.13 Having an up-to-date adopted Local Plan, that accords with the NPPF in place will ensure that the most appropriate development can come forward and developers and</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>landowners, such as the HCA can have confidence and clarity in delivering new development.</p> <p>3.14 The proposed housing requirement set through draft policy H1 equates to the delivery of 326 dwellings per annum over the plan period. While this remains marginally below the previous targets set through the South East Plan (375 dwellings per annum) it is greater than the earlier West Sussex Structure Plan (300 dwellings per annum) and the Preferred Strategy Local Draft. While these two documents will have limited weight given their current status, they represent the historic position of CBC to deliver in the region of 300-400 dwellings per annum. The LDF evidence base suggests that a provision of 300-600 new homes per year should be made, and recommends that the higher end of this scale should be adopted in order to meet project population growth and demographic changes, and in order to meet the identified housing need. While the proposed figure sits at the lower end of the scale, it does fall within the recommended level of provision to meet housing need. Having an up-to-date plan in place will not restrict further housing development above this level, rather it will provide additional confidence to those delivering housing.</p>	
REP/013 (CSC2055701\0)	Crest Strategic Projects	H1	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/074 (CSC2055720)	West of Ifield Consortium: Rydon Homes, Wates Developments and Welbeck Strategic Land LLP	H1	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/006 (CSC2055755)	Mr. Julian Goodban Bellway Homes Limited (South East Division)	H1	<p>These submissions are made on behalf of Bellway Homes Ltd (South East Division). By virtue of Section 110 of the Localism Act 2011, the Council has a 'duty to co-operate' in relation to the 'planning of sustainable development' whereby local planning authorities, county councils and a number of other public bodies are obliged to cooperate to maximise the effectiveness of development plan documents where they relate to strategic matters.</p> <p>A 'strategic matter' is defined at section 110 (4) as:</p> <p>(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and</p>	

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			<p>(b) sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.</p> <p>The NPPF sets out strategic priorities in paragraph 156 which should be provided for through strategic Local Plan policies, such as the Crawley Local Plan. These cover a range of topics including homes and jobs, health and community infrastructure, retail, leisure and transport infrastructure. The NPPF highlights the duty to cooperate on cross-boundary planning issues and the importance of collaborative working to ensure that strategic priorities are properly coordinated and development requirements can be met (paragraph 179). Moreover, the NPPF requires local planning authorities to take account of different geographic areas, including travel to work areas, to facilitate the delivery of sustainable development (paragraph 180). Indeed:</p> <p>“The Government expects joint working on areas of common interest to be diligently undertaken for the benefit of neighbouring authorities”. (paragraph 178)</p> <p>In setting its proposed housing requirements for the Borough, the Council ought to have had regard to a range of documents and evidence. It has sought to identify it's locally generated housing requirements. The SHMA was undertaken on a joint basis with neighbouring boroughs and districts, reflecting the operation of the housing market area, which extends to include neighbouring districts such as Horsham and Mid Sussex.</p> <p>Through the Submission draft, Crawley has maintained its approach of a capacity based (or as it states a supply based) approach. Policy H1 of the emerging plan identifies a need for 4,895 net dwellings in the period 2015-2030, with an annualised target of 326 per annum.</p> <p>We make no comment upon the proposed components of supply, other than the Council appears to be placing significant reliance upon the NE Sector neighbourhood (Forge Wood) in the first 10 years. Any delay in delivery will have a significant impact upon 5 year supply.</p> <p>The shortfall of 3,130 is to be met elsewhere in the NW Sussex and Surrey SHMA area:</p> <p>“The constrained nature of Crawley's land supply means that 60% of the borough's predicted demographic housing need over the next 15 years can be met within the borough boundaries. The remaining unmet housing need from Crawley, of 3,130 over the Plan period, will be delivered through the Local/District Plans covering the remainder of the northern West Sussex and East Surrey Housing Market Areas, as far as is consistent with planning policies to do so, as agreed through the northern West Sussex Position Statement with Horsham and Mid Sussex District Councils and the Statement of Common Ground on meeting strategic housing needs with Reigate and Banstead Borough Council” (para 6.40).</p>	

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			<p>In terms of justification and discharge of the Duty to Cooperate, the Northern West Sussex Position Statement (July 2014) was signed by Crawley, Horsham and Mid Sussex and states:</p> <p>“The three authorities recognise that, across the North West Sussex housing market area as a whole, the local plans they are producing will not fully meet objectively assessed housing needs, a shortfall generated primarily from within Crawley where a variety of constraints dictate a capacity-led approach to meeting housing needs. Each authority has assessed the ability of its area to accommodate further housing development in the light of this shortfall. They each consider that they are doing the maximum reasonable to meet the objectively assessed housing needs of the area as a whole, taking into account local constraints, and the need for sustainable development.” (para 6.16)</p> <p>In short it is an agreement of the position, but nothing tangible has been agreed in terms of solutions. None of the authorities are meeting their own objectively assessed housing need. In terms of Crawleys shortfall, this is accepted but there is no formal agreement as to how it is to be addressed either spatially or in terms of unit numbers. In terms of the Reigate Statement of Common Ground, again this reads as an agreed ‘state of play’ and intention to continue to co-operate. In short both documents read as an agreement to ‘do nothing’.</p> <p>There is clearly an absence of co-operation as requirement by section 110 of the Act and paragraphs 178 to 181 of the NPPF.</p> <p>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 justified nor consistent with national policy (see para 182 of the NPPF).</p>	
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	H1	<p>See detailed attached representations to DfC.</p> <p>The assessed housing need in the plan of 8,100 dwellings over the plan period is unsound because it is unjustified. It is unjustified because the scenario alighted upon under-estimates the scale of the need in Crawley. Secondly, the assessment of need does not address some of the requirements of national planning policy.</p> <p>The figure of 8,100 is based on Crawley’s Locally Generated Housing Needs Assessment 2011. Paragraph 6.11 of the plan refers to this. The figure of 542 dpa relates the demographic baseline scenario (paragraph 6.12).</p> <p>The figure of 542 dpa corresponds to scenario A in the Locally Generated Housing Needs Assessment 2011. This is described on pages 34-36 of the report. This scenario provides a robust assessment of the baseline demographic needs, plus it also makes an allowance for transactional vacancies. This is consistent with the advice in the NPPG that consideration of the official household and population projections should</p>	Therefore, it is the HBF’s view that the objectively assessed need for Crawley is likely to correspond more closely to scenario D and the figure of 664 dpa, rather than scenario A: the baseline demographic need. The advantage of planning on the basis of scenario D is that this level of supply would also provide an adequate response to the problem of affordability, while also addressing the affordable housing need in full by meeting the needs of the total housing waiting list (see the Housing Scenario on page 43 of the report).

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>provide the starting point in the objective assessment of housing need (ID 2a-015-20140306).</p> <p>However, we have three issues with this assessment. Firstly, the assessment is based on what is now fairly dated ONS 2008-based Sub National Population Projections (SNPP). The 2012 SNPP issued this year will have reflected data from the 2011 Census. It might have been useful if the Council ran the same method using the 2012 SNPP. However, we accept that it is possible that the baseline demographic has not changed too greatly over the interim period. For example, the DCLG 2011 Interim Household Projections would appear to support this: for the period 2015-20 these projections indicate that some 3,000 households might form. If one assumes a similar rate of household formation for next ten years of the plan (2020-2030) then this indicates that some 9,000 households are forecast to form in total.</p> <p>The second, and perhaps more important issue, is the requirement of the NPPF (paragraph 17) and the guidance in the NPPG that plans and the assessment of housing need takes into account market signals. Scenario A is purely a demographic assessment: no adjustments have been made to this baseline assessment to counteract the effects of deteriorating affordability. There is evidence for poor affordability in Crawley. We note that paragraph 6.57 of the plan acknowledges the significant increase in house prices since 2001 while average earnings have remained relatively low. This is supported by the ONS table 577 which records the ratio of median house prices to median earnings. This shows that the ratio of house prices to incomes was 4.99 in 2001. By 2013 this had risen to 6.22. It was higher still in 2008 before falling with the recession, but the upward trajectory is now re-occurring.</p> <p>Thirdly, the baseline demographic scenario makes no allowance for a potential increase in inward migration from London and reduction in people leaving Crawley for London, in line with the Mayor of London's assumptions that have informed his Further Alterations to the London Plan (the FALP). We note that the Northern West Sussex Authorities Position Statement, revised July 2014, refers to the London Plan. As described above, the Mayor's housing assessment is predicated on a 5% increase in outward migration above trend, and 3% decrease in inward migration to London (see paragraph 1.10C of the FALP). We therefore consider that some allowance does need to be made by Crawley and rest of the HMA for the very strong likelihood of greater levels of inward migration from London and possibly fewer households moving to London. An upward adjustment needs to be made to the housing requirement to accommodate the effect of these migration assumptions. Since the assessment of need that has been carried out by the authorities of the HMA is only an assessment of their baseline demographic needs, it is questionable whether scenario A in Crawley's Locally Generated Housing Needs Assessment 2011 and the figures stated in Table 1 on page 31 of the DTC Statement for the rest of the HMA do provide a reliable forecast of need.</p>	

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			<p>Placing a figure on what this might mean in terms of housing supply is difficult for the HBF to do. We do not have the facilities to run the modelling. However, in view of the challenges emerging from London over the next ten years, we consider that scenario D: short term past migration trends will provide a more accurate forecast of future needs. This scenario reflects trends in migration that have occurred since 2004/5, reflecting, as the report states "much higher levels of in-migration" (paragraph 3.35). This is significant: it shows that despite the effects of the recent recession, inward migration to Crawley has remained consistently strong. This also accords with the Mayor of London's assumption that outward migration from London will gradually return in line with the trend witnessed before the recession (the increase in London's population evidenced by the 2011 Census representing a shorter term cyclical rather than a longer term structural change). The Mayor anticipates more outward migration as the economy recovers and as more households seek appropriate accommodation outside of London. Notwithstanding the Mayor's migration assumptions, the matter of London's identified but unmet need (between 7,000 and 20,000 dwellings per year depending on whether the backlog is addressed over ten years of twenty) will also tend to fuel higher levels of demand in Crawley and the rest of the North West Sussex HMA.</p> <p>The plan will make provision for 4,895 dwellings over the plan period 2015-2030, at an annual average monitoring rate of 326 dpa. This is set out in policy H1 and in the supporting paragraph 6.38.</p> <p>We note the discussion in paragraphs 6.11-6.13 of the local plan. This provides a very clear description of how the Council has assessed its housing need. This is very welcome. We note that the housing requirement in Policy H1 represents the difference between the identified capacity for 4,895 dwellings (paragraph 6.25) and the objectively assessed need for 8,100 dwellings, or 535 dpa. The figure of 8,100 represents, in other words, the unconstrained need.</p> <p>We accept capacity limitations confronting Crawley: we accept that the figure of 4,895 is probably all that can be reasonably accommodated even though we have not scrutinised the capacity of the Borough in any detail. A little more might be delivered but this is unlikely to contribute significantly to reducing the deficit of circa 3,000 dwellings.</p> <p>Although it may seem an academic point given the lack of capacity in Crawley, we do not agree that the figure of 8,100 is necessarily representative of the objective needs of Crawley. It is important to consider this point in order to gain a proper understanding of the likely scale of the unmet need in Crawley and the implications this has for the HMA.</p>	
REP/050 (CSC2055768)	Persimmon Homes and Taylor Wimpy Ltd.	H1	<p>HOUSING NEED / NUMBERS</p> <p>1.1. Our comments are prepared on behalf of Persimmon Homes Thames Valley and Taylor Wimpey Ltd</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>1.2. It is considered that Policy H1 is unsound because it is unjustified as it is not based on up-to-date relevant evidence. This is likely to result in the Local Plan under estimating the scale of housing need in Crawley</p> <p>1.3. Paragraph 2.17 of the Local Plan states that “By 2030, to meet the needs of its growing population, the town would need a further 8,100 new homes.” This figure is based on the 2011 ‘Locally Generated Housing Needs Assessment, prepared by Nathaniel Lichfield & Partners, Scenario A, which identified 540 dwellings per annum. The Local Plan para 2.20 acknowledges that identified supply will allow the borough to provide for “approximately 60% of its objectively assessed housing needs”. Resulting in a shortfall of approximately 3,000 dwellings, as acknowledged in the Local Plan at para 2.22. Any reliance on the NLP Locally Generated Housing Needs Assessment must be tempered with the recognition that this assessment is based on the 2008-based Sub National Populations projections. Moreover, Scenario A of the NLP assessment is based on a purely demographic assessment, it does not therefore accord with the requirements of the NPPF (paragraph 17) and the PPG as it does not take into account market signals, not least because this Scenario does consider the need to address worsening affordability within the borough.</p> <p>1.4. The precise basis for identifying the objectively assessed need in the Borough is not coherently explained in the Local Plan. As set out previously, the Local Plan begins with a commentary of housing needs with reference to the NLP 2011 report, but later in the document (paragraphs 6.11 to 6.13) further information on the Borough’s Objectively Assessed Housing Needs is provided which concludes that the NLP 2011 assessment has been superseded by more recent assessments</p> <p>Paragraph 6.13 refers to the additional work that was undertaken in early 2014 to determine the Objectively Assessed Housing Need (OAHN) for the borough. Paragraph 6.13 confirms that this update identified an annual requirement of 535 dwellings per annum, which equates to 8,025 dwellings over the Plan period 2015-2030. This represents a slight reduction when compared to the NLP 2011 Assessment, but does not alter the fact the Local Plan housing provision (Policy H1) falls considerably short of an objective assessment of housing need.</p> <p>1.6. Policy H1 sets a minimum figure for housing provision of 4,895 net dwellings in the borough in the period to 2030, this equates to an annualised rate of 326dpa, which means that the Borough is seeking to provide for just c60% of the identified OAHN.</p> <p>1.7. Clarification on the Local Plan housing requirement is set out in Topic Paper 2:</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>Housing need. This Topic Paper justifies the disparities between planned housing provision and the OAHN on the basis that the housing provision set in Policy H1 “represents a ‘supply-led’ requirement, and reflects the compact nature of the borough and its limited land availability and significant environmental, airport noise and safeguarding constraints” (Paragraph 1.3 of Topic Paper 2: Housing Need). The 4,895 housing requirement is based on capacity identified through the Strategic Housing Land Availability Assessment (SHLAA) and includes an allowance for windfall development. Whilst there may be a justifiable case, based on capacity within the Borough, which prevents the full objectively assessed housing need being delivered within the borough boundary, it underlines the importance of policies for the supply of housing within the Local Plan are correctly drafted to facilitate the delivery of additional (sustainable) development.</p> <p>1.8. The premise of the review is set out in paragraph 5.1 of Topic Paper 2 which states: The council considers that a demographic ‘baseline’ scenario based upon ONS projections for fertility, mortality and migration (to 2021) and DCLG Projections on Household Growth (2011-2021) is most closely aligned with objectively assessed housing need as identified in the NPPF. Two further scenarios were remodelled to provide a comparison with the demographic led scenario. These are ‘Zero net migration’ and ‘employment growth’ scenario.</p> <p>1.9. We are concerned that there appears to be a reliance on the 2011-DCLG based Household Projections as some sort of validation of the OAHN in the Borough. In any event it is clear that the borough is continuing to rely on demographic projections as the sole basis for OAHN. There is an attempt to provide a comparison of the demographic projections, by preparing two additional scenarios, 1) zero net migration and 2) employment growth scenario. However scenarios based on zero net migration are wholly unrealistic and should only be used to provide the absolute minimum requirements.</p> <p>1.10. We have serious concerns with the borough Council’s update to the OAHN as paragraph 5.3 of Topic Paper 2 confirms that only the demographic scenario and zero net migration scenario can be remodelled “because the data required to re-model the economic growth scenario is not fully available”. In this regard specific reference is made to the absence of travel to work data from the 2011 Census. It should be noted that para 5.3 acknowledges that travel to work patterns will have changed since the 2001 Census and that “this may have a significant effect on the number of homes required within the borough by 2030” (Our emphasis). If data that will have such an impact on future housing requirements is not available and is currently absent from evidence base, this raises serious questions as to the reliability of the OAHN identified in the Local</p>	

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			<p>Plan.</p> <p>1.11. Paragraph 5.4 refers to the need to consider the findings of the 2014 Northern West Sussex Economic Growth Assessment. This Assessment models three scenarios 1) baseline, 2) higher growth 3) potential site capacity. Paragraph 5.5 of Topic Paper 2 refers to the 'baseline scenario' which identifies a further 16,500 jobs over the Plan period, within traditional B use class businesses requiring a land take of 77ha. Crawley's employment land supply is identified at 42ha from existing commitments and allocations, consequently Topic Paper 2 confirms that it will be very difficult to accommodate this shortfall against the baseline requirement, given land supply constraints, and the safeguarding of land for a second runway at Gatwick. There is no discussion in the Topic Paper 2 as to how, if at all, the West Sussex Growth Assessment has been addressed in the OAHN process, or how the final OAHN figure supported by the Borough is consistent with, and supportive of, the objectives/projections of the 2014 West Sussex Growth Assessment.</p> <p>1.12. Topic Paper 2 does not provide an analysis of the dwelling requirement associated within the employment/job growth projections set out through the 3 scenarios as presented in the West Sussex Assessment. Furthermore, it is not clear how, if at all, the associated economic/jobs generated from a second wide spaced runway at Gatwick Airport have been considered</p> <p>1.13. Neither the NLP 2011 Assessment or subsequent updates to the OAHN consider the potential increase of inward migration from London. In this regard we refer to the 'Further Alterations to the London Plan' (FALP) which deals with future migration trends. The FALP provides a number of future migration scenarios and of particular relevance is the FALP "Central" scenario which assumes an increase of 5% for out-migration and a decrease of 3% for in-migration from London. An alternative "Low" scenario, which assumes domestic migration trends to pre-2008 levels would result in out-migration increasing by 10% and in-migration decreasing by 6%. The Crawley Local Plan and supporting evidence is silent on the migration trends associated with London and in doing it fails to consider the need for an upward adjustment to housing needs to accommodate the effects of these migration scenarios.</p> <p>1.14. In summary we consider that the Local Plan is unsound for the following reasons: it fails to respond to the requirements to meet in full the objectively assessed need or provide adequate strategies to address the shortfall between OAHN and planned delivery; the evidential basis for the OAHN is considered to be flawed and based on incomplete data; it is too reliant on demographic projections as the final indicator of OAHN; the OAHN fails to properly consider the economic / job growth requirements produced in the 2014 West Sussex Growth Assessment and the implications for housing need in the borough; and</p>	

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			the OAHN does not consider the future migration scenarios associated within London and the implications on housing needs within the Borough.	
REP/073 (CSC2055771)	Mr. Matthew Ellis Waverley Borough Council	H1	<p>Thank you for giving Waverley Borough Council the opportunity to comment on the submission of the Crawley Local Plan.</p> <p>It is recognised that Crawley wishes to maintain its role as a key economic driver in the sub region. However, the submission Local Plan states that a minimum of 4,895 new homes will be provided for, which is more than 3,000 new homes short of the number objectively assessed as needed for Crawley up to 2030. As Waverley is part of Guildford/Woking housing market area which the submission Local Plan recognises the Crawley housing market area overlaps with to the west, under provision of housing in Crawley could result in pressure for more housing in Waverley.</p> <p>Waverley is a predominantly rural Borough that has a number of environmental designations that constrain development. These include the Green Belt, an Area of Outstanding Natural Beauty and Special Protection Areas. Therefore, although Waverley Borough Council has yet to finish testing how much housing it can sustainably deliver, it is very unlikely that Waverley would be able to accommodate unmet need for another housing market area.</p>	Waverley therefore welcomes paragraph 6.40 of the submission document that the remaining unmet housing need from Crawley will be delivered through the Local/District Plans covering the remainder of the northern West Sussex and East Surrey Housing Market Areas, as far as is consistent with planning policies to do so. However, Waverley would be reassured if this intention was part of Policy H1 rather than the explanatory text to it.
REP/047 (CSC2055791)	Mayfield Market Town	H1	PLEASE SEE FULL REPRESENTATIONS, SECTION 4 AND SECTION 6. ALSO REPORT 1: HOUSING REQUIREMENT AND NEED	SEE MAIN REPRESENTATIONS, SECTION4 AND REPORT 1.
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	H1	Paragraph 6.13 identifies that a 2014 update of the objectively assessed housing needs resulted in approximately 8,000 houses are required (reduced from approximately 8,100 houses in 2011). However Policy H1: Housing Provision specifies that 4,895 new homes will be delivered within the required timescale. As per paragraph 6.10 Housing Need identifies, the NPPF requires Local Authorities to demonstrate that they are meeting the full, objectively assessed needs for market and affordable housing. Even if the full number of windfall sites come forward that have been identified in Paragraph 6.27, 645 dwellings, there is a shortfall of approximately 2,350 houses and as such we have concerns that the plan may not be considered sound or suitably robust. In addition the Infrastructure Plan is not consistent with the Local Plan as it states that 4,000 houses will be delivered by 2030.	
REP/033 (CSC2055843)	Horsham District Council	H1	<p>We note that Policy H1 makes provision for the development of a minimum of 4,895 dwellings in the period 2015 - 2030, which is a supply-led housing requirement averaging at 326 dwellings per annum.</p> <p>HDC recognise and appreciate the constraints CBC face with regards to housing land availability, and acknowledge that substantial work has been undertaken recently by</p>	

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			<p>the Council through an Urban Capacity Study identify all possible sites for housing by leaving 'no stone unturned' with regards to available land within the Borough's boundaries. HDC support the efforts of CBC to identify all available sites for housing, and are pleased to note that the total supply of land for housing within the Borough has been increased by 28.8% from 3,800 dwellings in the Preferred Strategy to 4,895 in the draft submission.</p> <p>Despite this, it is noted that work undertaken in 2014 to update the 2011 LGHNA (using latest population and household projections, including 2011 Census data) identifies an annual requirement for 535 dwellings per annum (8,025 total) which is considered to be the Objectively Assessed Need for CBC. HDC understands that this target may not be achievable given the constraints of the physical boundary of the Borough, the limited land availability, and significant environmental and airport-related constraints; but note that by working to a Local Plan target of 326 dpa over the plan period this is a minimum enabling further housing sites to be brought forward to meet the unmet need, results in a shortfall of 3,135 dwellings (209 per annum) which will need to be situated in other locations within the Northern West Sussex HMA.</p> <p>Whilst we understand the reasons behind the formulation of the housing target set in Policy H1 and appreciate the efforts CBC have made to positively plan for future housing development, as an adjoining Local Authority, HDC express concern that the Crawley 2030 Local Plan does not plan to meet the Borough's objectively assessed needs in full. HDC 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, Mid Sussex and Horsham) to assess the most appropriate opportunities and potential solutions to the meeting the overall housing needs in the area.</p> <p>Although we recognise that it may not be physically possible to accommodate all CBC's existing housing needs within the Borough boundary, we expect there to continue to be an exhaustive search for all possible sites for housing. It is recommended that the planning policies in the strategy should recognise that any available 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.</p> <p>HDC is pleased to see reference in the submission draft to the recently updated SHMA (2014). Whilst it is appreciated that this updated has only very recently been published, it is thought that wording in paragraphs 6.14 - 6.18 and 6.50 - 6.55 should be amended to reflect any relevant content of this updated joint study.</p>	
REP/062 (CSC2055844)	Sussex Police	H1	On average, there are 77.55 crimes per 1000 of the population in the Crawley Borough, the second highest crime rate in the Sussex County, thus every additional	

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			<p>1000 population will lead to additional crime and incidents. These issues were set out in full in our representation to Crawley Borough Council dated 28th August 2014. This representation is attached to this submission for convenience, and forms part of this formal representation on infrastructure needs relating to the Local Plan.</p> <p>Essentially, Policy H1 of the Crawley Submission Local Plan commits to the delivery of a significant number of net additional dwellings over the plan period. Policing is a population based service and the proposed uplift in population resulting from this development would inevitably place demands on existing policing services. Additional policing infrastructure is therefore sought to meet the needs of, and support, this new development.</p>	
<p>REP/027 (CSC2055769)</p>	<p>Gatwick Airport</p>	<p>H1</p>	<p>A further key aspect of the Local Plan is to bring forward suitable housing development sites particularly in areas experiencing population growth. We believe it is important to highlight as a busy and intensifying commercial airport operation that it is crucial that housing is not brought forward in locations which are subject to undesirable levels of noise from aircraft now or which are likely to be unacceptable as the airport expands. GAL recognises the factors CBC must balance in achieving the delivery of new housing development and supports the overall need for new residential development. However GAL does not support the identification of future housing sites within the North East Sector / Forge Wood which we believe may be subject to unacceptable levels of noise.</p> <p>As explained above we consider that for major housing sites this is frequently recognised as unacceptable at a noise level beyond 60db LAeq. Whilst GAL recognises that areas of the NES have been afforded planning consent in 2008 a Scoping Report application related to a variation to the original planning proposal has recently been submitted (August 2014) by the developers of the North East Sector to CBC. This relates to a proposed change in the design and layout of the previously permitted NES application - this includes proposals for noise sensitive development such as a school, community facilities and housing.</p> <p>GAL consider that this proposal to be wholly inappropriate and unacceptable in the light of the Airport Commission now short listing Gatwick for a second runway. We therefore do not support the Plan in identifying these sites for major housing schemes or for noise sensitive development in areas which would be subject to existing or future noise levels exceeding 60 dba. We therefore do not support further potential for major housing sites or urban extension to be located at Forge Wood which would be exposed to noise beyond the 60 dba noise threshold as proposed in Policy HC2 of the Plan. We do acknowledge and support the text of para 6.21 of the Plan which identifies the need for land to be safeguarded at Gatwick for a potential second runway and that this constraints the development of any future housing pending the outcome of the Airport Commission process in 2015. We also support the text highlighting that housing development proposal must also be constrained to areas which fall outside of unacceptable levels of noise exposure given both the existing noise contours as a</p>	

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			<p>single runway operation and those to be applied if an additional runway was to be realised in the lifetime of the Plan. GAL would like to seek the addition to para 6.21 of the Plan of suggested new supporting text:</p> <p>‘and where major housing development is proposed it will not be permitted in noise contours within the 66dba noise LAeq16 hour noise threshold’. We believe that the delivery of new major housing (1900 dwellings) at Forge Wood needs to fully take into account the potential for noise impacts associated with the airport due to the close proximity of the Forge Wood site and specifically the potential for a new runway to be brought forward. GAL believes such text addition needs to be included within the supporting text of para 6.38 to clarify the potential constraints on housing provision and when applying Policy H1. This is particularly important as there is potential for the NES consented permission to be amended given that a new EIA Scoping Report has recently been submitted by the developer to CBC regarding changes to the original design and infrastructure layout at the NES/Forge Wood. GAL requests that the last paragraph of the policy requires the policy inclusion of text;</p> <p>‘ pending finding of the Airport Commission’</p> <p>The policy as proposed is suggesting for housing develop to occur in year 11 - 15 of the Plan which would overlap with the time frame for delivery of a potential second runway at Gatwick’.</p>	
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	H2	<p>These representations are made primarily in relation to the former TSB site at Russell Way, Crawley. The site is located within the built-up area of Crawley, close to the main road from Three Bridges railway station to the town centre, the A2220 Haslett Avenue East Road. Access to the site is provided from Russell Way.</p> <p>Key Housing Site</p> <p>We support the identification of the former TSB site at Russell Way as a Key Housing Site as identified on the draft Proposals Map and by draft Policy H2 of the Local Plan Submission.</p> <p>On the basis of the high accessibility of the site (which forms part of the built-up area of Crawley and which is accessible to both Three Bridges and Crawley rail stations), we do, however, consider the designation of the site for only 40 residential dwellings to comprise a missed opportunity to optimise its development potential and to “boost significantly the supply of housing” as sought by national planning policy.</p> <p>This designation is also for significantly fewer dwellings than was secured previously as part of the previous planning permission covering both the former TSB site and the SEEboard site which comprised 270 residential dwellings and which was granted planning permission by the Secretary of State in August 2006 (LPA Ref: CR/2005/0812/FUL). This permission has now lapsed, but establishes the principle for a significantly greater quantum of development at the site.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>The policy should promote flexibility and should seek to optimise the development potential of all sites. A design-led approach should be encouraged, which should then inform the overall density of housing schemes coming forward. Initial feasibility assessments indicate that between circa 70 and 90 dwellings could be delivered at the site, and the policy should be amended to reflect this. It is also reasonable to expect a greater density of development at the site if brought forward alongside other neighbouring parcels.</p> <p>Having reviewed the Council's latest Annual Monitoring Report (AMR) for 2012/13 (which forms part of the evidence base for the Submission Local Plan), it is clear that Crawley has consistently under delivered against its housing targets. In 2012/13, the AMR states that only 85 new dwellings were completed, with six demolitions over the same period, therefore resulting in a net gain of only 79 dwellings. This is significantly below the projected West Sussex Structure Plan requirement of 300 dwellings per annum.</p> <p>The NPPF requires local authorities to identify and update a supply of deliverable sites to provide five years worth of housing, with an additional 5% buffer. Where there is a record of persistent under delivery, local planning authorities must provide a 20% buffer.</p> <p>This is a brownfield site within the settlement boundary, and best use should be made of it to relieve pressure on Greenfield sites. The policy as drafted is therefore inconsistent with national policy and in order to be effective, should be amended to encourage a higher density of residential accommodation to come forward at the site.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/051 CSC2055590	Mr. David Payne Mineral Products Association (MPA)	H2	<p>Please note: Representation made online previously but 'error' message appeared at submission and so representation re-submitted here.</p> <p>Tinsley Lane is proximate (100m) to Crawley Goods Yard. A number of MPA members operate facilities at this site including an aggregates rail depot (operating 24 hours), concrete batching plant and asphalt plant. A construction and demolition waste recycling plant has also recently been permitted. The site is therefore very important for the steady and adequate supply of minerals and construction materials to the area.</p> <p>NPPF (para 143) requires that such facilities are safeguarded. The West Sussex Minerals Local Plan identifies the site as an Area to be Safeguarded and Policy 37 requires that existing minerals rail heads are safeguarded from other forms of development to ensure that adequate facilities for transport of minerals by rail are available.</p> <p>The development of residential properties close to the goods yard may constrain and prejudice the ongoing operation and development of the site and conflict with NPPF and Minerals Local Plan policy.</p>	Tinsley Road is deleted from Policy H2. Failing that, the policy is amended to require that planning, layout and design of development must take account of existing proximate land uses in so as not to prejudice existing or permitted uses and operations at the safeguarded Crawley Goods Yard and in Manor Royal Employment Area.
REP/005 (CSC2055592)	Mr. Richard Bucknall Tony Fullwood Associates	H2	<p>The Submission Local Plan is not</p> <ul style="list-style-type: none"> positively prepared as it is not based on a strategy which seeks to meet objectively assessed development requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; justified as it is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; effective as the housing need is not deliverable over the plan period; consistent with national policy by not enabling the delivery of sustainable development <p>in accordance with the policies in the Framework.</p> <p>Amend Policy H2 as follows: Policy H2: Key Housing Sites The following sites are identified as key housing sites and allocated on the Local Plan Map. These are considered to be critical to the delivery of future housing in Crawley and are identified as being 'deliverable' within the first five years of the Plan (2015/16 - 2019/20) or 'developable' in years 6-10 (2020/21 - 2024/25)39.</p> <p>Deliverable</p> <ul style="list-style-type: none"> Land East of Street Hill (30 dwellings) 	<p>Amend Policy H2 as follows: Policy H2: Key Housing Sites The following sites are identified as key housing sites and allocated on the Local Plan Map. These are considered to be critical to the delivery of future housing in Crawley and are identified as being 'deliverable' within the first five years of the Plan (2015/16 - 2019/20) or 'developable' in years 6-10 (2020/21 - 2024/25)39.</p> <p>Deliverable</p> <ul style="list-style-type: none"> Land East of Street Hill (30 dwellings) <p>Given the suitability of the site, it is important that the Built-Up Area Boundary is revised as part of the Local Plan - Crawley 2030 (as encouraged by NPPG – Housing and economic land availability assessment: Para 22). Amendments need to be made to the BUAB to include the land East of Street Hill in order to positively seek opportunities to help meet the housing needs of the area.</p>

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			<p>The NPPF seeks to boost significantly the supply of housing (Para. 47). The NPPF states that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (Para 14). For plan-making this means that:</p> <ul style="list-style-type: none"> • local planning authorities should positively seek opportunities to meet the development needs of their area; • Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> ○ any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or ○ specific policies in this Framework indicate development should be restricted. <p>The NPPG encourages local planning authorities to attempt to remove any identified site constraints (Housing and economic land availability assessment: Paragraph: 22). When assessing the sites against the adopted development plan, plan makers need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites and whether such constraints may be overcome (NPPG - Housing and economic land availability assessment: Para 19). Updated evidence confirms that of the issues identified in the 2014 SHLAA as requiring further action, none should preclude the allocation of land east of Street Hill as a site for residential development. This evidence demonstrates that the site is suitable for housing development. The site can assist in meeting the objectively assessed housing needs of Crawley without any adverse impacts which would significantly and demonstrably outweigh the benefits of providing much needed new homes and without contravening the NPPF.</p> <p>Given the suitability of the site, it is important that the Built-Up Area Boundary is revised as part of the Local Plan - Crawley 2030 (as encouraged by NPPG – Housing and economic land availability assessment: Para 22). Amendments need to be made to the BUAB to include the land East of Street Hill in order to positively seek opportunities to help meet the housing needs of the area.</p> <p>In conclusion, given the context of the NPPF; NPPG and up to date evidence, land east of Street Hill should be allocated as a deliverable site within Policy H2.</p>	
REP/019 (CSC2055623)	Mr. Charles Crane	H2	<p>NB: Legally compliant - N/K Compliant with the duty to cooperate - N/K Crawley Borough Council's (C.B.C.'s) Open Space Study proposes a space standard for parks and recreation grounds of 1.6 hectares/thousand population. CBC have confirmed to me that this has been adopted and on a neighbourhood by neighbourhood basis.</p>	<p>Modifications Needs: The removal of plans to build homes on playing fields and play spaces in Bewbush* (and perhaps elsewhere). CBC have not proved that these parks are surplus to requirement and these spaces will be</p>

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			<p>The Open Space Study confirms this figure is a MINIMUM (e.g. para. 9.7, p.115). Current population of Bewbush is approximately 9156. This gives a park and rec. ground requirement of 14.65ha (i.e. 9156 x 1.6). Current park and rec space is approx. 14.95ha (NOT the 16.25ha quoted in the Open Space Study). (This figure of 14.95ha needs clarifying as it does not match figures I obtained with a trundle wheel, but is close - 0.3ha less in total). The building of more homes on playing fields will take Bewbush below the MINIMUM space standard for park and rec. grounds.</p> <p>This is also contrary to Policy OS2 (p.110 of Open Space Study) and ENV4 (p.90 submission Local Plan consultation draft). Mr. Nutt (Forward Planning Dept.) emailed me on 18.12.13 stating that Bewbush has a surplus of nat. grn. space and amenity grm. space.</p> <p>These figures need checking. CBC sat all open spaces serve similar functions. However, the figure for natural grn. space includes, for example, the surface area of the Mill Pond, which is unsuitable for sport. C.B.C. have also stated that Buchan Park (owned by West Sussex C.C.) and the, as yet, not provided park at Kilnwood Vale (owned by Horsham D.C.) will be available to Bewbush residents. It is unacceptable for C.B.C. to build upon its own parks and expect other authorities to provide open spaces. Topic Paper 3 (Housing Land Supply) states that Breezehurst Drive Park has low occasional use. This claim is based on conversations with a groundsman who worked for a "long period" in Crawley's parks (Mr. Nutt's email of 9.10.14).</p> <p>Even this unscientific study shows that four other parks in Crawley have the same number of users, and a further three only score one more. I have seen people using the park at Breezehurst Drive. However, facilities at the park have been reduced; play equipment was moved to a new site, goals have been removed and pitches are no longer marked out. This could reduce the attractiveness of the park. CBC claim that some of the surface at Breezehurst Drive is low quality, but it didn't stop Crawley Town F.C from using it as their Training Ground. They even won promotion from League 2 whilst there, so I'm not sure how bad it is.</p> <p>Have C.B.C. considered alternative sites?</p> <p>Bewbush has the greatest density of population of any neighbourhood in Crawley. It is impossible to predict accurately what will happen to the size of the population over the next sixteen years.</p> <p>An increase in population will lead to an increase in demand for park space. Crawley Borough Council has a minimum standard for park and recreation grounds. A minimum is a minimum, regardless of any other issues. If the council sticks to its own policies, there will be no more building on the parks in Bewbush (and possibly elsewhere).</p>	protected if the council sticks to its own policies. *i.e. Breezehurst Drive and Henty Close.
REP/012 (CSC2055687)	Bupa Care Services	H2	<p>Policy H2 'Key Housing Sites'</p> <p>It is considered that the change to policy H2 (from the cabinet version of the DLP) to remove of Oakhurst Grange from the list of key housing sites is not sound or legally</p>	It is therefore considered that should Oakhurst Grange be included as a key deliverable housing site in Policy H2.

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			<p>compliant.</p> <p>Oakhurst Grange was added to the DLP by Officers following a pre-application process relating to a residential development. It was therefore considered appropriate by Officers for residential use. However, members chose to remove it against the advice of Officers when the DLP was considered by cabinet prior to being released for this consultation.</p> <p>We have sought to understand from Officers why Oakhurst Grange was been removed; however there is no apparent planning justification for this. It therefore appears that the decision has been a purely political one, which is not a sound or legally compliant reason to remove a site which has been assessed by professional Officers as being a key site in the urban area to help meet housing need. Furthermore, the decision to do this was not based on an identified or quantified need for it to remain as a care home.</p> <p>A review of the Council's most recent AMR (2012/13) and the evidence base to the Local Plan (housing topic paper, the LGHNA the 2012 SHMA) does not make any specific reference to the need to provide for elderly persons accommodation. In fact, to the contrary it is made very clear that Crawley is a Borough comprising primarily of a younger population with two thirds being under 45 years old. The LGHNA goes as far as stating that the younger structure of the population means that natural growth is set to drive increases in the local labour force.</p> <p>This further demonstrates that the decision was not a technical one made on sound planning grounds.</p> <p>It is acknowledged that accommodation to meet the needs of elderly people in the Borough still has to be provided. However, as demonstrated in the report provided by BUPA which accompanies this written submission (contained in Appendix 1) there is no evidence to support Oakhurst Grange being retained for such a purpose. Indeed, the evidence provided by BUPA clearly demonstrates that this site is no longer required for care home accommodation. It also explains that all former residents were easily and quickly re-housed and that there have been no inquiries regarding the site to reopen for care home purposes. It goes on to highlight that there is an ample supply coming forward of equivalent accommodation in the area, all of which clearly demonstrates that Oakhurst Grange is no longer required for care home purposes.</p> <p>Indeed, the draft Local Plan does not include any specific policy on elderly person's accommodation; the absence of such a policy appears to confirm that this is not regarded by the Council as a significant issue.</p>	<p>It is available, suitable deliverable for residential development and complies with the principle of sustainable development.</p> <p>In addition the Council need to identify significantly more housing sites if they are to meet OAH and deliver past under-delivery. Finally, there is no evidence to support Oakhurst Grange being retained as elderly persons accommodation.</p>

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			<p>Furthermore, as the site is currently vacant and has been for over a year following its closure by the Care Commission, it is not currently in use as a community facility and therefore does not come under the remit of draft Policy ICS1.</p> <p>It is also relevant that Oakhurst Grange is available now, suitable for residential development and deliverable within 1-5 years. Given the Council's housing supply situation, this should weigh strongly in allocating the Site for residential development (all in accordance with paragraph 49 of the NPPF).</p> <p>In this regard it is important to highlight that the Site is located within the urban area, in close proximity to the town centre of Crawley and within an established residential neighbourhood. It is therefore located within a sustainable location, with good transport links to the town centre and surrounding area. It also has good access to public transport services (bus and rail), to footpath and cycling networks and to community facilities. Furthermore, it clearly comprises previously developed land that is not subject to any restrictive planning or environmental designations. Thus, in accordance with paragraph 14 the Site represents the opportunity to positively plan to meet the development needs of the Borough.</p> <p>With regard to the implications of housing supply and the need to identify a deliverable five year housing land supply, it is considered that the capacity of many of the sites identified in policy H2 is over estimated. These figures appear to some from the Council's SHLAA; however this document does not give a robust assessment of whether the figures provided by landowners are actually deliverable. Indeed, it is likely that the numbers attributed to each of the sites will diminish significantly when plans are progress. We also question whether some of the sites that have been identified as being deliverable within 1-5 years will actually deliver the amount of housing allocated. Forge Wood for example is expected to deliver 1,900 in the first five years. This seems highly unlikely given that housebuilders on average only deliver 50 units on a site per year. Even if this site is being progressed by a consortium of several house builders it is extremely unlikely that all 1,900 units will be delivered within five years. It is clearly a strategic site that will take many years to come forward and deliver that level of housing. Furthermore, all of the sites listed are urban sites, many with existing uses and current occupiers, and some with previous commercial / industrial use. Therefore, it will be timely and expensive to remove existing uses, and there may be unforeseen issues such as contamination which further delay their deliverability. All are also located in established areas, and therefore have constraints to development in terms of impact on existing character and amenity, which could further reduce the amount of housing they will actually deliver.</p> <p>We therefore consider that the supply identified by the Council in Policy H2, is not robust and as such they should be looking to identify more sites within it. Oakhurst Grange meanwhile is vacant of its previous use and does not have any unforeseen</p>	

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			<p>issues that would delay its delivery. The owners are also actively engaged with developers to ensure that a suitable residential development is presented to the Council imminently. All of which weighs significantly in its favour.</p> <p>Finally, the Council should be looking to deliver past undersupply early in the emerging Local Plan period, preferably within the first five years (as per the Sedgefield method), meaning that more sites than less should be allocated for residential development early in the plan period, especially where they are appropriate for development when assessed against footnote 11 of the NPPF, as is the case with Oakhurst Grange.</p>	
REP/079 (CSC2055699)	Homes and Communities Agency	H2	<p>Policy H2: Key Housing Sites</p> <p>3.15 Support - The HCA are in full support of both the inclusion the land East of Tinsley Lane and Kilnmead Car Park within the allocated sites Policy H2. Both of the sites are developable, deliverable and available within the early stages of the plan period. The sites will jointly contribute a minimum of 178 units to the overall housing delivery, subject to a suitable design a greater number could be achieved. Taking account of the amendments made to the Local Plan, the HCA consider the housing strategy and policy to be sound.</p>	
REP/015 (CSC2055717)	CEMEX UK Operations Ltd.	H2	<p>Policy H2 is unsound as the proposed designation of Tinsley Lane, Three Bridges, for 138 dwellings, mixed use recreation/residential is not consistent with national policy and is not justified.</p> <p>*Continued on attached sheet*</p> <p>In particular CEMEX UK Operations Ltd. are concerned about the proximity of the Tinsley Lane site to Crawley Goods Yard which is outlined in red on the attached site location plan (ref: 2571/17 A). There is a minimum distance of only 100 metres between the two sites.</p>	Omission of Tinsley lane from Policy H2 is required to make the policy sound.
REP/074 (CSC2055720)	West of Ifield Consortium: Rydon Homes, Wates Developments and Welbeck Strategic Land LLP	H2	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/002 (CSC2055736)	Aggregate Industries UK Limited	H2	<p>Policy H2 is unsound as the proposed designation of Tinsley Lane, Three Bridges, for 138 dwellings, mixed use recreation/residential is not consistent with national policy and is not justified.</p>	Omission of Tinsley lane from Policy H2 is required to make the policy sound.

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	REP/002		<p>In particular Aggregate Industries are concerned about the proximity of the Tinsley Lane site to Crawley Goods Yard which is outlined in red on the attached site location plan (ref: 2571/17 A). There is a minimum distance of only 100 metres between the two sites. Crawley Goods Yard is an established rail fed aggregates depot which has been in existence for many decades and benefits from largely unrestrained working hours. This allows large volumes of aggregate to be transported by rail, resulting in a highly sustainable form of development. Activities on the site include an asphalt plant operated by Aggregate Industries, 24 hour unloading of trains and open storage of aggregates; a concrete batching plant operated by CEMEX UK Operations Ltd; and a temporary mobile crusher and screener for processing of construction and demolition waste.</p> <p>Day Group also recently obtained planning permission for a permanent construction and demolition waste recycling plant (WSSC/016/12/CR, granted February 2013). The layout of the site is shown on the attached site location plan (ref: 2571/17 A). Crawley Goods Yard is identified as a 'safeguarded site for existing rail depots' in the West Sussex Minerals Local Plan (2003 as saved 2007). Policy 37 on railhead states: "Existing minerals rail-heads will be safeguarded from other forms of development where appropriate to ensure that adequate facilities for the transportation of minerals by rail are available".</p> <p>The Goods Yard is also clearly protected by the National Planning Policy Framework (NPPF) which sets out at Paragraph 143 that existing, planned and potential rail heads and rail links for the bulk transport of minerals, including recycled, secondary and marine-dredged materials, by rail must be safeguarded. In addition, Paragraph 143 also requires that existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material must be safeguarded.</p> <p>Aggregate Industries are concerned that the development of the Tinsley Lane site for residential use, in such close proximity to the Goods Yard, could lead to objections from future residents about the existing operations of the site. Whilst the various existing operations take place with the benefit of environmental controls, it is considered highly inappropriate to place a noise sensitive development in close proximity to this active railhead.</p> <p>Paragraph 123 of the NPPF sets out that planning policy should: "recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established".</p> <p>The uses undertaken at Crawley Goods Yard comprise a highly sustainable</p>	<p>Notwithstanding our clients' outright objection to the Tinsley Lane site, if any designation for housing does come forward, the policy must ensure that any future proposals have due regard in their siting and layout to the existing industrial and rail related activities on the depot site to ensure that future occupants of any proposed dwellings do not have cause for complaint as a result of the permitted and currently operating activities on the site and associated sidings. In particular, noise and dust studies must be carried out to ensure that the impact will be sufficiently mitigated and a suitable buffer between the Yard and any residential development should be provided.</p> <p>The requirement for development to be planned, laid out and designed to take into account the Goods Yard must be made clear in the policy text in order to at least provide the safeguarded railhead with some protection.</p>

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			<p>development making use of a safeguarded existing rail depot site. The development comprises sophisticated facilities with comprehensive site management measures and procedures to minimise impact on amenity considerations. However, the arrival, unloading and departure of trains, which serve the activities within the yard in respect of transfer of aggregates to the plants, as would be expected on a site of this nature, can give rise to some degree of noise and potential disturbance.</p> <p>The nearest existing residents to the Goods Yard are currently approximately 250 metres from the site. Future residents on the Tinsley Lane site would be significantly closer and therefore there could be potential noise issues. The requirements and expectations of residents are quite different to those of commercial operations. Aggregate Industries is therefore concerned about the impact of the proposed designation both on the new residents due to a lack of residential amenity provision and also on existing businesses as they face pressure from those new residents to alter the nature and timing of their work to reduce noise, for example. It is possible that these restrictions will lead to extra burdens on the existing businesses, undermining other efforts to increase economic activity at a time of recovery from recession.</p> <p>The potential impact on the Goods Yard has been recognised in the evidence base. For example, Appendix C of the Strategic Housing Land Availability Assessment (SHLAA) (July 2014) provides an overview of the site and notes that noise mitigation will need to be factored into the layout and design of the scheme in view of its proximity to Crawley Goods Yard.</p> <p>Given the close proximity of the site we would question whether the layout and design will overcome the potential negative impact on the Goods Yard. We have not seen any evidence to justify that this issue can be overcome. Certainly the layout would need to ensure that the new houses are no closer than existing ones and there is a sufficient buffer between the uses.</p> <p>Furthermore, despite this issue being recognised in the evidence base the issue is not translated into the draft Policy. The issue is also recognised in the Sustainability Appraisal/Strategic Environmental Assessment (August 2014) (henceforth SA) which sets out the following points in relation to the proposed Tinsley Lane site: "Noise pollution associated with the airport and aggregates goods yard to the north of the site would need to be considered in design and mitigation of any properties. Air Quality and Noise issues have been identified in relation to the northern and southern most site and would need to be addressed fully before the site could be considered appropriate Uncertain Impact."</p> <p>"Whilst the provision of new housing is closely linked to supporting economic growth, the development of this site would need to ensure the functioning of the business to the north is not impeded by additional residential properties. Possible Negative or Slight Negative Impact (-?)."</p> <p>"There are a number of significant issues which need to be addressed before this site</p>	

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			<p>can be brought forward for development (loss of open space, air quality, transport assessment and aircraft noise).” The site scores poorly in the SA compared with other sites e.g. Brighton Road, Land adjacent to Langley Green Primary School and Former TSB site.</p> <p>In light of the above, it is considered that the proposed site at Tinsley Lane cannot be considered to be a sustainable development. By the Council's own admission, there are significant levels of uncertainty surrounding the site negative impact on the existing industrial operations at the Crawley Goods Yard. In this context the proposal to locate residential development on the Tinsley Lane site should not be considered sound as it conflicts with National and local planning policies which protect existing businesses and safeguard rail-fed depots. There are alternative sites proposed for residential development and therefore we consider that this allocation is not justified.</p>	
REP/049 (CSC2055743)	Mr. James Walton Network Rail	H2	<p>See attached full detailed representation. Network Rail would like to raise a major area of concern regarding the Kilnwood Vale Joint Area Action Plan due to its location in relation to level crossings, which is discussed in detail below. In regards to the rest of the Local Plan and the proposals it makes Network Rail is generally supportive, in particular the support for transport improvements and an acknowledgement that funding is required from Developers in order to fund necessary infrastructure improvements. Network Rail would like to see this funding specifically applied to improving the safety and sustainability of the operational railway infrastructure, with particular emphasis on level crossings and station improvements.</p> <p>Level Crossings: In its current form Network Rail has strong concerns regarding the Strategic Development Location for 2500 new homes known as Kilnwood Vale, due to its close proximity to the level crossings known as Bewbush, Kilnwood and Kilnwood FP. Any development of this land which would result in a material increase or significant change in the character of traffic using these rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocation would have on the safety and operation of these level</p>	<p>See attached full detailed representation. In light of the potential for developments, as a result of the Crawley Borough Local Plan 2015-2030, which will impact the level crossings in the Kilnwood Vale area, Network Rail would seek the following:</p> <ol style="list-style-type: none"> 1. That any proposal going forwards includes an independent transport assessment in line with Local Plan Policy IN3, but should specifically include a section on the impact of increased users (both vehicular or pedestrian) at any level crossings within the area, or which may be impacted by diversionary routes or new highways leading to or from the developments. 2. Where a proposal has an increase in type and volume of user at a level crossing, Network Rail would seek closure of that crossing if feasible. 3. Where feasible and suitable we would seek replacement of level crossings with suitable bridges. We would seek a developer contribution towards the funding of the bridge either via CIL, s106, or a unilateral undertaking. Where proposals are large scale we believe that the developer should provide full funding for the bridge, for smaller proposals a contribution would be sort in proportion to the development. Discussion would need to take place between

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>crossings. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Appendix 1 outlines the level crossings potentially affected by the Kilnwood Vale proposal which includes their location, type, description, existing issues, risk score, and highlights the potential impact of any new development, which in this case we would consider to be severe.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by third party planning proposals which are fully outlined in Appendix 2. It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>Crawley Borough Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway.</p> <p>Detailed below are Network Rail's comments on the Local Plan, I would be grateful if the council could consider prior to finalising the Local Plan.</p>	<p>the local and county councils on issues of bridge ownership, construction etc.</p> <p>4. Where replacement with a bridge is not feasible we would seek a diversion order of, for example, a public footpath - which would include discussions with the LPA, Highways and PROW teams.</p> <p>i. The developer will be responsible for the preparation and submission of the diversion orders.</p> <p>5. The developer and the council agree that only a specific percentage of dwellings are constructed prior to the installation of any bridge / diversion of the footpath, and the closure of the relevant level crossing, which should be a condition of approval.</p> <p>6. That in principle written support is given by the council planning team, highways team, and PROW team to the closure of the level crossing and the diversion / installation of a bridge.</p>
REP/049 (CSC2055743)	Mr. James Walton Network Rail REP/049	H2	<p>Development Site Allocations</p> <p>Network Rail agrees with Para. 6.20 which states, "planning policies should avoid the long term protection of sites, and land allocations should be reviewed regularly."</p> <p>According to Para. 2.17, the identified demand for housing is 8100 new homes by 2030.</p> <p>The Local Plan provides provision to create a minimum of 5000, therefore leaving a shortfall on the identified housing demand of 3100 homes.</p> <p>The Economic Growth Assessment (EGA) undertaken by the council to inform the Local Plan identifies 77ha of future requirement business use floorspace in Para. 5.10, and a baseline demand in employment growth of 16,500 jobs by 2031 in Para. 5.18.</p> <p>The Local Plan itself however, only proposes opportunities for 42ha of employment land in Policy EC1, leaving a shortfall on the requirement of 35ha.</p>	<p>Therefore due to the identified demand for Housing and Business Use sites within the Local Plan, and the shortfall on specific site allocations to meet this demand, Network Rail would request that if any sites in our ownership are put forward for either of these uses they would be looked on favourably by the council to enable Crawley Borough to meet its housing and employment targets.</p> <p>Network Rail would suggest that some of its Rail Stations within the borough would provide excellent opportunities to make up part of this shortfall which are discussed below.</p>
REP/058 (CSC2055753)	Sarah Harrison Southern Water	H2	<p>Southern Water is the statutory water supplier for most of Crawley Borough south of Gatwick Airport.</p> <p>This includes all of the 'deliverable' and 'developable' sites identified in Policy H2: Key Housing Sites.</p>	<p>We propose that the following text is included in site specific policies, for both the Forge Wood and Southern Counties sites, to recognise the requirement for adequate utility infrastructure to</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>Southern Water has no objection to the allocation of any of these sites for development. However, capacity checks carried out in accordance with paragraph 162 of the National Planning Policy Framework (NPPF) have shown that the existing capacity of the local water distribution network is insufficient to meet the anticipated demand at two of the sites:</p> <ul style="list-style-type: none"> • Forge Wood, Pound Hill (1900 dwellings) • Southern Counties, West Green (218 dwellings) <p>It is worth noting that Southern Water also carried out these checks in response to Crawley's Local Plan Preferred Strategy Consultation Draft and the Local Plan Additional Sites consultation. Our representations relating to the Preferred Strategy were submitted some time after the response deadline, with the agreement of the local authority, as we had not been made aware of the consultation at the appropriate time. We have been unable to assess the 'Town Centre Key Opportunity Sites' because we the number of dwellings for each individual site is unknown. We explained the impact of the results in our representations submitted in summer 2013. We requested that any identified lack of capacity should be reflected in site specific policy text in the Local Plan. Unfortunately these requests have not been met. We are therefore unable to support policy H2: Key Housing Sites as sound on the grounds that:</p> <ul style="list-style-type: none"> • it is not positively prepared as it does not reflect the evidence we provided on infrastructure requirements, • it is not effective as it does not support delivery of necessary infrastructure, and • it is not consistent with national policy. <p>This lack of capacity is not a constraint to development. However, we consider that criteria should be added to the site allocation policy to support delivery of the necessary infrastructure to meet the new demand. This approach is consistent with the following paragraphs of the NPPF:</p> <ul style="list-style-type: none"> • paragraph 17 and the Core Planning Principle to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'; • paragraph 21 which states that planning policies should recognise and seek to address any lack of infrastructure; • paragraph 157, which states "Crucially, Local Plans should: plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework". <p>As development proposals are decided in accordance with policies, we are concerned that in its current form, the policy may permit development at these sites to proceed before the infrastructure required to serve them is available. Southern Water has limited powers to prevent connections, even when capacity is insufficient.</p>	<p>serve these proposed developments: The development should provide a connection to the water distribution system at the nearest point of adequate capacity, as advised by Southern Water.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>Planning authorities therefore have an important role to play, through planning conditions, to ensure that the necessary local infrastructure is delivered in parallel with the development.</p> <p>Furthermore, if the Council's intention to secure the necessary infrastructure is not signalled sufficiently strongly to potential developers, they may neglect to incorporate the cost of the infrastructure into their proposals. This could impact on deliverability. Southern Water is not fully funded to provide local infrastructure, as Ofwat, the water industry's economic regulator, expects the company to recover new development and growth costs from developers. The principle relating to the recognition of infrastructure constraints in site specific planning policies was tested at the examination of the Ashford Urban Sites and Infrastructure DPD. The Inspector (Patrick T. Whitehead DipTP(Nott) MRTPI) concluded in his report (paragraph 84): "The NPPF (para 157) makes it clear that local plans should plan positively for the infrastructure required in the area. In the context provided by this new guidance I agree with SW that the requirement to upgrade the existing sewerage infrastructure where necessary should be included within policy wording." The Inspector's Report can be accessed online at the following link: http://www.ashford.gov.uk/urban-sites-dpd.</p>	
REP/022 (CSC2056817)	Day Group Ltd.	H2	<p>Policy H2 is unsound as the proposed designation of Tinsley Lane, Three Bridges, for 138 dwellings, mixed use recreation/residential is not consistent with national policy and is not justified.</p> <p>In particular Day Group are concerned about the proximity of the Tinsley Lane site to Crawley Goods Yard which is outlined in red on the attached site location plan (ref: 2571/17 A). There is a minimum distance of only 100 metres between the two sites. (See attachment for rest of wording)</p>	Omission of Tinsley Lane from Policy H2 is required to make the policy sound.
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council	H2	<p>Policy H2: From a mineral safeguarding point of view, the County Council does not consider that there is currently sufficient evidence of any detrimental impacts arising from the proposed mixed use recreation/residential at Tinsley Lane, Three Bridges in respect of adjoining aggregate uses. Therefore the County Council, as the Minerals Planning Authority, does not object to the allocation of such a use within the Crawley Local Plan if the adjoining minerals safeguarding is appropriately considered through the allocation. It is clear that the evidence of any such impacts will be forthcoming through a detailed planning application and the County Council reserves the right consider the proposal in detail at that stage.</p>	
REP/057 (CSC2055766)	Heidi Clarke Sport England	H2	<p>However Sport England has concerns relating to the allocation of sites which are currently playing field land and has concerns relating to the evidence based used to inform such allocations.</p> <p>In particular Sport England is aware of the following playing field allocated for housing:</p> <ol style="list-style-type: none"> 1. Tinsley Lane in Three Bridges (138 dwellings, mixed use recreation/residential) 2. Breezehurst Drive Playing Fields, Bewbush (65 dwellings) 3. Bewbush West Playing Fields- Also identified as having some potential for 	<p>The Local Plan policy (informed by the PPS and Infrastructure Plan) needs to be clear on which developments will be required to:</p> <ul style="list-style-type: none"> • Provide onsite sports provision/ payment in kind as part of the development • Make a financial contribution towards an identified offsite provision - under S106

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>delivering a degree of housing</p> <p>4. Ifield Community College, Ifield (125 dwellings)</p> <p>If any other allocations relate to existing playing field then the comments provided will be as applicable. Crawley Borough Council undertook a Playing Pitch Strategy (PPS) over a 6 week period in 2013. This document forms part of the evidence base used to inform the Local Plan. At this stage Sport England will not comment on the robustness of the PPS, but will provide a summary of its findings:</p> <p>Football</p> <ul style="list-style-type: none"> • There is a shortage of pitches for youth teams but in general there is adequate pitch coverage. • Deficient of 3G pitches. • The Council identify a need for a covered AGP and are in discussion with Crawley Town FC about such development • Maidenbower and Ifield advised they do not have enough pitches for matches. Furnace Green, Three Bridges and Ifield said there were not enough pitches available for training <p>Cricket</p> <ul style="list-style-type: none"> • The document was prepared out of the cricket season therefore no qualitative assessments were undertaken. Overall across the Borough there are probably enough cricket pitches currently but existing sites are nearing capacity. • Ifield CC reports various barriers to club development: shortage of pitches (senior and junior) and shortage of artificial and indoor facilities for training. Also advice drainage improvements are also needed. • In general Crawley is in need of better facilities as the current ones are fairly dated. There will be additional need in the future for more pitches and should be provided in new development. <p>Rugby</p> <ul style="list-style-type: none"> • There is an undersupply of junior and mini rugby • No qualitative assessments were undertaken. • Crawley RFC is in discussion with Council regarding a 3G at the club. The Council also support the need for 3G for rugby due to the difficulty of maintaining pitches. The clubs report a need for pitches to train on as they are both expanding. <p>Hockey</p> <ul style="list-style-type: none"> • Existing clubs have no plans to develop facilities and they rate existing pitches as good. 	<ul style="list-style-type: none"> • Provide a CIL contribution (which will be used to fund major projects set out in the Reg 123 list) <p>In terms of the PPS, the action plan needs to be linked to identify housing developments in the Local Plan, and a clear steer given on which development should fund this work/provision.</p>

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			<p>Consequently from the very general summary provided, it would appear that all existing playing fields are required and none is identified as being surplus to requirements. Whilst paragraph 6.47 of the Local Plan acknowledges how the development of Tinsley Lane will need to take into account the existing football club the policy does not require placement provision on any of the existing playing field allocated to provide housing. The Local Plan does not seem to recognise the findings of the playing pitch strategy.</p> <p>The PPS does not try to predict future demand for pitches derived from new development however it introduces standards. Sport England is not supportive of a standards based approach. The PPS can make reference to standards, but should only be used as a benchmarking tool and should be caveated as such, and should not be used to formulate standards based policies. A standards based policy approach was advocated by the old PPG17, however, this is no longer considered a robust policy approach to achieving investment into sport because of paragraph 204 of the NPPF and introduction of the CIL regulations.</p> <p>With a standards based approach, it cannot be argued that the amount of open space is necessary to make the development acceptable, nor would it take account of existing open space within the locality which may be underused.</p> <p>Another document forming the evidence base of the Local Plan is Crawley Infrastructure Plan 2014 which advises that there is no need identified for the provision of new sports facilities but the quality of existing provision could be improved e.g. drainage, changing facilities, 3G pitch surface. However it also states that new playing pitches should be provided in the North East as part of development however does not identifies exactly what is needed.</p> <p>The Local Plan policy (informed by the PPS and Infrastructure Plan) needs to be clear on which developments will be required to:</p> <ul style="list-style-type: none"> • Provide onsite sports provision/ payment in kind as part of the development • Make a financial contribution towards an identified offsite provision - under S106 • Provide a CIL contribution (which will be used to fund major projects set out in the Reg 123 list) <p>In terms of the PPS, the action plan needs to be linked to identify housing developments in the Local Plan, and a clear steer given on which development should fund this work/provision.</p> <p>It is unclear how Crawley Local Plan has taken account of the evidence base. For that reason Sport England would question the soundness of its policy.</p> <p>Sport England would be happy to provide further advice on how local authorities can strategically plan for sports facilities. There are a number of tools and guidance</p>	

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			documents available, which can be found on Sport England's website at: www.sportengland.org/planningforsport . In addition Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England's website at: www.sportengland.org/planningtoolsandguidance . The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs.	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	H2	<p>Housing</p> <p>A further key aspect of the Local Plan is to bring forward suitable housing development sites particularly in areas experiencing population growth. We believe it is important to highlight as a busy and intensifying commercial airport operation that it is crucial that housing is not brought forward in locations which are subject to undesirable levels of noise from aircraft now or which are likely to be unacceptable as the airport expands.</p> <p>GAL recognises the factors CBC must balance in achieving the delivery of new housing development and supports the overall need for new residential development. However GAL does not support the identification of future housing sites within the North East Sector / Forge Wood which we believe may be subject to unacceptable levels of noise.</p> <p>As explained above we consider that for major housing sites this is frequently recognised as unacceptable at a noise level beyond 60db LAeq. Whilst GAL recognises that areas of the NES have been afforded planning consent in 2008 a Scoping Report application related to a variation to the original planning proposal has recently been submitted (August 2014) by the developers of the North East Sector to CBC. This relates to a proposed change in the design and layout of the previously permitted NES application - this includes proposals for noise sensitive development such as a school, community facilities and housing.</p> <p>GAL consider that this proposal to be wholly inappropriate and unacceptable in the light of the Airport Commission now short listing Gatwick for a second runway. We therefore do not support the Plan in identifying these sites for major housing schemes or for noise sensitive development in areas which would be subject to existing or future noise levels exceeding 60 dba. We therefore do not support further potential for major housing sites or urban extension to be located at Forge Wood which would be exposed to noise beyond the 60 dba noise threshold as proposed in Policy HC2 of the Plan. We do acknowledge and support the text of para 6.21 of the Plan which identifies the need for land to be safeguarded at Gatwick for a potential second runway and that this constrains the development of any future housing pending the outcome of the Airport Commission process in 2015. We also support the text highlighting that housing development proposal must also be constrained to areas which fall outside of unacceptable levels of noise exposure given both the existing noise contours as a</p>	<p>GAL would like to seek the addition to para 6.21 of the Plan of suggested new supporting text:</p> <p>“and where major housing development is proposed it will not be permitted in noise contours within the 66dba noise LAeq16 hour noise threshold”. We believe that the delivery of new major housing (1900 dwellings) at Forge Wood needs to fully take into account the potential for noise impacts associated with the airport due to the close proximity of the Forge Wood site and specifically the potential for a new runway to be brought forward. GAL believes such text addition needs to be included within the supporting text of para 6.38 to clarify the potential constraints on housing provision and when applying Policy H1. This is particularly important as there is potential for the NES consented permission to be amended given that a new EIA Scoping Report has recently been submitted by the developer to CBC regarding changes to the original design and infrastructure layout at the NES/Forge Wood. GAL requests that the last paragraph of the policy requires the policy inclusion of text;</p> <p>“pending finding of the Airport Commission”</p> <p>The policy as proposed is suggesting for housing develop to occur in year 11 - 15 of the Plan which would overlap with the time frame for delivery of a potential second runway at Gatwick.</p>

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			single runway operation and those to be applied if an additional runway was to be realised in the lifetime of the Plan.	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	H2	<p>Policy H2: Key Housing Sites</p> <p>Gatwick Airport seeks therefore amendments relating to the provision of new major housing sites at Forge Wood /North East Sector in the proposed policy HC2. Gatwick seeks the addition of policy text which clarifies that residual land with Forge Wood which is identified as having potential to bring forward new major housing is limited to sites below noise contours of 60db LAeq which GAL considers is the maximum acceptable noise exposure limit for the development of new major housing schemes. Development of new housing in the NES at noise exposure thresholds 60db LAeq, based on GAL aspiration for growth, could in our opinion compromise, due to the incompatibility of residential housing development and a second runway at Gatwick, the ability for GAL to bring forward the timely delivery of a twin runway development.</p> <p>GAL supports the overall need for the inclusion of a policy in relation to the provision of new housing during the life of the Plan but objects to the Policy H2 promoted in the Plan on the basis of the deliverability of housing in Forge Wood. GAL strongly considers that such major housing schemes delivered by the proposed application of this policy will be located within unacceptable noise exposure contours and that such housing would be incompatible with or would compromise the delivery of a potential second runway at Gatwick Airport.</p>	GAL strongly considers that such major housing schemes delivered by the proposed application of this policy will be located within unacceptable noise exposure contours and that such housing would be incompatible with or would compromise the delivery of a potential second runway at Gatwick Airport.
REP/040 (CSC2055777)	Mr. Iain Millar Tinsley Lane Residents Association	H2	<p>PLEASE SEE FULL REPRESENTATION</p> <p>This is a group response representing 141 households. Individual responses from 44 households are attached.</p>	PLEASE SEE FULL REPRESENTATION
REP/063 (CSC2055850)	Sogno Family	H2	<p>PLEASE SEE SUPPORTING EVIDENCE</p> <p>Attached documents include: * Submission Representation * Land at Heathy Farm Masterplan Document * 028.0029PB071113 LOI NES Crawley</p> <p>One further document is available separately in the paper and electronic files (but is too large to upload): * 028 0029TOR2 NES Crawley Access Opportunities Report (Bound)</p> <p>2.1 The benchmark set by the National Planning Policy Framework (NPPF) is that Local Planning Authorities in forming their respective Local Plans meet their own housing needs, and any unmet needs of other Authorities in the same housing market</p>	<p>PLEASE SEE SUPPORTING EVIDENCE</p> <p>4.1 As per Policy H2 of the Local Plan, the LPA has listed key deliverable and developable sites and assigned a quantum of housing for each site. In effect, these sites have been identified by Policy H2 to come forward for residential use, removing any ambiguity over the status of each site and showing a commitment from the LPA that it wishes and expects to see them developed for residential use in a timely manner.</p> <p>4.2 Thereafter, the Council has cited a number of broad locations, which includes 150 dwellings</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>area, as far as is consistent with the Policies of the NPPF. To this end, the first test of soundness concerns whether the Plan has been 'positively prepared'.</p> <p>2.2 It has been acknowledged by the Borough Council, that in preparing its Local Plan it will not be meeting its objectively assessed housing needs of its growing population (Paragraph 1.35). As such, it has formed a Local Plan with a 'policy on' housing requirement, which is based not on meeting an identified housing need, but based upon an assumed level of housing capacity.</p> <p>2.3 At the Examination in Public, the Borough will be tested at length on two pertinent points regarding this approach; the first whether it has acted proactively to identify and bring forward opportunities for housing within the Borough, and secondly, under the Duty to Co-operate, how any resulting shortfall will be provided for within neighbouring authorities. While a significant proportion of the debate to be undertaken at the Examination will focus on the latter, this representation submitted on behalf of the Sogno Family examines the former, and whether the Council has taken a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible (Policy H1).</p> <p>2.4 Before examining this point, it is necessary to quantify the extent of housing shortfall that is expected to occur within the Borough when measured against the 'policy off' quantum of housing need.</p> <p>2.5 In 2009 a Strategic Housing Market Assessment (SHMA) was prepared for the West Sussex Housing Market Area. The Report looked beyond Local Planning Authority boundaries and adopted a regional approach to identifying housing needs. This Report was updated in 2012 by GVA, making specific reference to each of the Authorities within the study area.</p> <p>2.6 At the same time, a separate Report was prepared by NLP (Locally Generated Housing Needs Assessment & LGHNA), to quantify the locally generated housing needs, which used a series of differing trends to quantify the housing need for Crawley and produced a range of between 120 dwellings to 664 dwellings per annum. Such large differences in the range of annual need are not uncommon within such Reports, as the methodology used for each trend can vary significantly. In forming its Submission Draft and as a consequence of this Paper, the Borough Council had offered that its 'policy-off' housing requirement would be 542 dwellings per annum.</p> <p>2.7 These separate Papers were further supplemented by the Housing Need Topic Paper, published in August 2014, which looked specifically at the Plan Period of 2015 to 2030 and has been prepared in support of the Local Plan Submission Draft. This Paper amended the housing need quantum down from 542 dpa to 535 dpa.</p>	<p>within the residual land at Forge Wood (formerly NES), which relates to Heathy Farm and one other site as per the Key Diagram. Unlike the key sites listed, there is ambiguity within this section of Policy H2, which does not provide the confidence to my client that the Council will support a Planning Application in the short term, even though the Council relies upon the site within its overall housing strategy and quantum of housing it says is available to come forward during the Plan Period.</p> <p>4.3 In order to make the Plan sound, the LPA should adopt the approach advocated within Policy H1 and work proactively with the landowner and specifically reference the ability of Heathy Farm to come forward for 100 dwellings within an amended Policy H2. Such an amendment would support the LPA's use of the land within its overall housing capacity assessment, and its belief that it has explored all opportunities to proactively identify opportunities.</p> <p>4.4 To not, and to maintain the status quo, will bring into question the approach advocated by the LPA that it has explored all opportunities, while at the same time advocating a total 'policy on' housing requirement some 40% lower than what is needed. Such a position is of particular concern given the long history of this site within the former North East Sector, and indeed the Council's own admission in June 2013 that it wishes to see the land come forward for development.</p> <p>4.5 For the benefit to the Examination and in addition to correspondence sent to the County Council in November 2013 seeking additional information, appended to this Statement is the original promotional document and Highway Options Report prepared to inform discussions with the Local Planning Authority.</p>

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			<p>2.8 Whilst not the focus of our submission. It is worthwhile noting that 535 dpa is unlikely to be the objectively assessed level, for two reasons:</p> <p>1. The Planning Practice Guidance (PPG) is clear that affordability is one of the main influences on how baseline population projections may be adjusted, the NLP LGHNA evidence demonstrates that upward of 630 dpa would be required to meet existing and future needs (of circa 254 dpa).</p> <p>2. The Local Plan policy on employment (EC1) seeks 77 ha of employment land (total B Class), which equates to the 'baseline scenario' of the Economic Growth Assessment (EGA) (prepared for the Councils of Crawley Borough, Mid Sussex District and Horsham District - April 2014). The EGA 'higher growth scenario' more aligned to the Gatwick Diamond / Coast to Capital LEP aspirations equates quantitative need for 'at least' an additional 20,130 jobs of which 8,310 would be B-Class (1,007 and 415 jobs respectfully per annum over the period 2011-31). This sits at odds with 535 dpa which CBC state would support only 399 jobs per annum (paragraph 6.5 of Topic Paper 2 - Housing Need - August 2014). More homes are needed to meet wider jobs aspirations.</p> <p>2.9 For the benefit of the Examination therefore, it is possible to quantify the disparity between the policy off need of (at least)535 dwellings per annum, and the proposed policy on housing requirement of 326 dwellings per annum, which when taken over the course of the Plan Period equates to in excess of 3,000 dwellings (probably more). Indeed, it is acknowledged within the Submission Draft that the Council is only proposing to meet some 60% of what it considers to be its objectively assessed housing need. 60% should be taken as a maxima given that the objectively assessed needs are likely to be higher.</p> <p>2.10 Such a significant difference between what is acknowledged to be needed and what is proposed to be provided will bring into sharp focus at the Examination whether the LPA has indeed 'positively prepared' its Local Plan. For the reasons set out within Section 3, it is our contention that the LPA has not done all that it could to meet this test of soundness.</p>	<p>4.6 On behalf of the Sogno Family, it remains their position to work proactively with the Local Authority and County Council to bring this land forward for residential use in the short term. In doing so, the site should be listed as a key site within Policy H2.</p>
REP/063 (CSC2055850)	Sogno Family	H2	<p>continuing representation...</p> <p>3.1 The Council has placed a significant degree of weight on its stated position that it has worked proactively in seeking out opportunities for residential development within its administrative area. It makes such a statement both in the past tense, such as Paragraph 6.39, where the Council notes that it has endeavoured to ensure that every opportunity for residential development within the borough has been fully considered through the Local Plan process, and makes a commitment via Policy H1 to do so going forward: The council will positively consider proposals for the provision of housing to meet local</p>	<p>see attached documents and other representation form.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.</p> <p>All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development. The Local Plan makes provision for the development of a minimum of 4,895 net dwellings in the borough in the period 2015 to 203038.</p> <p>3.2 Such an approach is pivotal to the test of Soundness at the Examination, as if the Inspector is to find the Plan sound based on a policy on housing requirement that only meets (as a maxima) 60% of the Council's needs, then it would follow that each opportunity to deliver housing within the Borough has been looked at thoroughly.</p> <p>3.3 On behalf of the Sogno Family, Savills wrote to the Local Planning Authority in November 2012 as part of the Local Plan consultation process, highlighting the opportunity of land at Heathy Farm to come forward for residential use, which formed part of the residual area of the North East Sector outside of the Planning Approval obtained by Taylor Wimpey. This initial approach was supplemented by a meeting held in July 2013, where the willingness of the Family to see the land come forward as a 'key site' and work with the LPA to deliver housing completions quickly was reiterated.</p> <p>3.4 Indeed, prior to the meeting held with the LPA, it was conveyed by the Policy Team that the Council was keen to see the site brought forward for development [email received from CBC 18 June 2013].</p> <p>3.5 It has been well documented therefore that the landowners of Heathy Farm have actively sought the support from the Local Planning Authority to identify the land as a key site within the Local Plan, and moreover, to work proactively with the Local Planning Authority to realise the site's potential. In doing so, the landowner has invested in consultancy advice concerning capacity of the site and a Transport Opportunities Report, both of which have been submitted to the Local Planning Authority.</p> <p>3.6 Despite this investment on behalf of my client and assertion from the LPA that it has endeavoured to ensure that every opportunity for residential development within the borough has been fully considered through the Local Plan process, the site has not been listed as a 'key site', but has fallen into the realms of a broad location with little certainty over when the site may come forward, if at all.</p> <p>3.7 It has previously been stated by the LPA, that the site could not be listed as a key site and thus be considered deliverable on the grounds that its delivery may impinge on</p>	

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			<p>the delivery of the North East Sector in the short term. No substantive evidence has been provided to show how this would be the case, nor in our view, has the Local Planning Authority worked proactively with the landowner and their advisors to assess the opportunities for early delivery.</p> <p>3.8 A request from the Family's highway advisors was made in November 2013 seeking further information on S278 design drawings, junction modelling assessments, trip distributions and phasing plans associated with the wider North East Sector Application. This request was made to facilitate discussions over how the land at Heathy Farm could come forward in tandem with the larger North East Sector development. Despite requesting joint working, the approach for the additional information required was declined. A copy of this letter sent in November 2013 to the County Council Highways Department is appended to this representation.</p> <p>3.9 These series of events must bring into question the assertion within the submission draft that the Local Planning Authority has explored every opportunity, and that to follow through on the commitment made within Policy H1, it should re-engage with the willing landowner and its consultancy team to form a strategy for bringing the site forward proactively as a key site for circa 100 dwellings. the LPA to deliver housing completions quickly was reiterated.</p>	
REP/066 (CSC2055283)	Thames Water Savills	H2	PLEASE SEE THE SUPPORTING TABLE WHICH ANALYSES EACH SITE IN POLICY H2	
REP/050 (CSC2055768)	Persimmon Homes Thames Valley & Taylor Wimpey Ltd Pegasus Group	H2	PLEASE SEE FULL REPRESENTATION	PLEASE SEE FULL REPRESENTATION
REP/030 (CSC2055631)	Mr C Heyman DPDS Consulting	H2	The uncertainty surrounding the expansion of Gatwick Airport means that certain sites need to be treated with a degree of flexibility to ensure that they are deliverable in the future, whatever the Governments final decision. The information set out below refers to a particular site where such a flexible land use allocation strategy should be adopted.	The Local Plan currently identifies a site located between Steers Lane, Balcombe Road and Radford Road as part of the north east sector for housing development (Policy H2), however whilst this allocation is welcomed by the

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>land owner and which he wishes to see retained within the Local Plan, there also needs to be recognition that a potential second runway at Gatwick Airport would subsequently blight the site for residential development due to noise implications due to the site sitting adjacent to the airport safeguarding zone (Policy GAT2)</p> <p>In the scenario that Gatwick Airport becomes the Governments preferred option for expansion, the potential for airport use or airport compatible uses should be recognised and kept as an option in order to adopt a realistic and pragmatic approach to delivery of development on the site.</p> <p>Obviously should Gatwick Airports current bid fail then the sites residential potential would be realised. Our clients have discussed such proposals with members of Gatwick Airports expansion bid team, who agree with this approach as they would not wish to see applications made for residential development in such close proximity to an expanded airport for obvious reasons. Our client wishes to work collaboratively with key stakeholders within the local area and it is considered this flexible approach to land use allocation on this site would future proof the plan and allow for such circumstances to be taken into consideration in the compilation of housing delivery figures within the Borough.</p> <p>DPDS would be happy to elaborate the above information if required however at this time on behalf of our client respectfully request that the Local Plan Map and appropriate policies are modified to take into consideration the</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				scenario set out above and so to ensure that the Local Plan is sound in terms of deliverability and not out of date as soon as it is adopted.
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	H3	<p>We note the draft policy's reference to delivering an appropriate mix of house types and sizes on sites, dependent on the size and characteristics of sites and the viability of the scheme. We support this and consider it to compromise a reasonable and justified approach. At paragraph 6.53 (p77) of the Submission Local Plan, however, a draft mix is set out as follows:</p> <ul style="list-style-type: none"> - 18% 1-bedroom - 43% 2-bedroom - 30% 3 bedroom - 9% 4+ bedroom - <p>Whilst we note this preferred mix, we express reservations with it being applied too rigidly. Where there is strong market demand for the provision of a revised mix, and where the scheme viability and site characteristics support an alternative mix, this should not be resisted,</p>	In its application, the Policy should take account of individual development sites. The proposed mix should be subject to viability and site specific circumstances.
REP/050 (CSC20557680)	Persimmon Homes and Taylor Wimpey Ltd.	H3	<p>Policy H3: Future Housing Mix</p> <p>Revisions to the wording of Policy H3 are considered necessary to ensure the policy has sufficient flexibility built-in to ensure development proposals are not adversely affected by viability concerns which stem from an overly prescriptive policy requirement.</p> <p>The need to provide an appropriate mix of housing is supported and the policy should ensure that proposals reflect the housing requirements as set out in the latest evidence. However, as currently drafted the policy implies full compliance with the 2012 Strategic Housing Market Assessment.</p> <p>Whilst it is agreed that this is a sensible approach when considering housing need (i.e. normally in the context of affordable housing) it is important that the policy distinguishes housing need from market demand.</p> <p>It is considered that developers are best placed to judge the demand for open Market housing and they should not be forced into building something that they cannot sell. In reality developers will simply not bring forward sites for development in those circumstances and this has knock on implications for the delivery of affordable housing which is intended to meet housing needs.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			Accordingly the policy should be redrafted to distinguish between affordable housing and open market housing whereby the affordable housing should accord with the SHMA (and subsequent updates) but more flexibility is given for open market housing to allow developers to respond to changes in demand.	
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	H4	Whilst we appreciate the requirement to provide a range of housing tenures across development sites, the imposition of a baseline figure of 40% affordable housing and 70:30 split between affordable/social rented and intermediate accommodation does not take account of site specific circumstances and the ability of individual sites to deliver affordable housing. The target affordable housing provision should be subject to viability to ensure that it is deliverable.	The Policy should be amended to put greater emphasis on viability and site specific circumstances, to avoid stifling development.
REP/012 (CSC2055687)	Bupa Care Services	H4	Policy H4 'Affordable Housing and Low Cost Housing' It is acknowledged that affordable housing in the Borough is much needed; however, this needs to be balanced with the overall need to provide housing and the fact that market housing facilitates the delivery of affordable housing. Placing unnecessarily onerous requirements on market housing will prevent opportunities from coming forward with the resultant effect that affordable housing will not be delivered. In this respect we are concerned that a uniform rate of 40% affordable housing for all new development is too onerous and will be counterproductive, placing an unnecessary financial burden on sites. This will halt the delivery of much needed housing. Many sites, regardless of their size, come through the planning system on marginal viability. Placing a 40% affordable housing burden on them will prevent many of them coming forward. In addition to 40% affordable housing, Policy H4 also seeks low cost market housing to be provided on development proposing 15 dwellings or more. Together these amount to an onerous requirement on future development and will render many large sites unviable. It is acknowledged that the policy allows for viability to be taken into consideration, but demonstrating this is a costly exercise in itself. Indeed, this will be particularly damaging for sites in the urban and settlement areas, which as demonstrated by the SHLAA are generally small and will have the added financial implications of removing existing uses and possibly having to undergo remediation. As a consequence of unreasonable affordable housing and low cost housing requirements it is likely that many valuable sustainable sites will not come forward. This means that valuable brownfield sites will not be utilised. We are therefore very concerned that this policy will prevent valuable sites and opportunities from coming forward. It would also reduce the amount of deliverable housing to meet need, potentially meaning additional countryside allocations are required and decisions made on appeal. Decision making in this way is particularly unhelpful and indeed goes against the concept of localism.	For the above reasons we do not consider that policy H4 should require 40% affordable housing on all developments, and the provision of low cost housing is sound. We also do not believe they are in accordance with the NPPF, which clearly states that developments should not be subject to onerous obligations that would stifle development.

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			<p>We therefore consider that the threshold for contributing towards affordable housing should not be any lower than 10 dwellings and for schemes over this threshold there should be a scale for contributions, for example: 10 - 20 dwellings: 10% 20 - 40 dwellings: 20% 50 - 100 dwellings: 25- 30% 100+ dwellings: 35-40%</p> <p>With regard to low cost housing, this should not be an additional requirement over affordable housing. Indeed, policy H3, which seeks a suitable mix for housing developments, controls this issue in any case by requiring a large percentage of new housing to be 2 or 3 bedrooms in size, which are more affordable. Furthermore, there are various government initiatives, include Help to Buy, which help to ensure that first time buyers and those on lower incomes can get onto the property ladder. In general, house prices are market driven, and if the Council is to ensure a vibrant and growing economy for the Borough they should not look to artificially tamper with market forces.</p> <p>We also have concerns that Policy H4 does not make it clear how the mechanics of providing low cost housing will work. It lacks clarity to enable the decision maker to know how to determine an application and is not in accordance with paragraphs 14 and 155 of the NPPF. No detail is provided regarding the proportion of homes that would need to be sold at discounted prices; how much the discount from market rates should be, and how such a policy would be implemented.</p> <p>When considering the issue of affordability, it is important to highlight that housing should be provided to meet with need (the OAN), which does not solely focus on affordable housing. Local authorities need to ensure that sufficient market housing is provided as this will mean that more people can own their own home and house prices in general will be lowered. If affordable housing thresholds are set too high it will preclude valuable sites from coming forward, which will perpetuate the issue of a lack of housing in the Borough, thus continuing to drive prices high on the basis that supply does not meet demand or need.</p> <p>The characteristics of Crawley also need to be considered. It is a Borough where at least 60% of the dwelling stock is owner occupied; therefore whilst there is an affordable housing need this needs to be balanced with its population's desire to own their own home.</p> <p>We do not consider that the Council have adequately assessed the viability implications of this policy and at the present time we have serious concerns that this policy would render the Local Plan undeliverable.</p>	
REP/079 (CSC2055699)	Homes and Communities Agency	H4	Policy H4: Affordable Housing 3.16 Comment: The HCA note the increase in the level of affordable housing proposed in the Local Plan in comparison to that of historic consultations from 30% to 40%. The	

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			HCA in their detailed application will accord with the relevant affordable housing figure.	
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	H4	<p>The uniform rate of 40% affordable housing is unjustified. We do not consider that the viability assessment provides a reliable picture of the costs associated with bringing forward land for residential development.</p> <p>We note the inputs into the viability assessment: Crawley Borough Council Community Infrastructure Levy, SHLAA & Affordable Housing Viability Assessment, October 2013. We note that the viability assessment is predicated on a CIL payment of £100 per metre square. We note that the current average S106 payment is £2,056 per dwelling. The report anticipates planning obligations to fall to an average of £500 per dwelling (paragraph 4.18). This strikes us as very low and we consider this to be over-optimistic. While this may occur for small sites, the S106 costs associated with larger schemes are likely to be much higher. The Harman advice, for example, advises that strategic infrastructure costs for larger schemes are typically in the order of £17,000 - £23,000 per plot.</p> <p>The Council has only modelled the cost of building to Code for Sustainable Homes level 3. This would not account for the higher energy efficiency standards required under Part L of the Building Regulations - something that is already a statutory requirement - or for the cost of building to the zero carbon homes requirement which will be a mandatory requirement from 2016 onwards. The Harman guidance advises (see page 26) that while current build and regulatory costs should be used in viability modelling, plan-makers will need to take account for forthcoming regulatory changes that will come into effect within the first five years of the plan. The NPPG reiterates this guidance (ID 1-013-20140306). As the Harman guidance explains, the key example is the forthcoming change to the Building Regulations arising from the Government's zero carbon agenda. The cost of complying with the current Building Regulations is already higher than Code 3. The cost of achieving zero carbon homes will be higher still. The Zero Carbon Hub report entitled Cost Analysis: Meeting the Zero Carbon Standard, February 2014, is generally acknowledged to provide the most up-to-date assessment of the costs associated with building zero carbon homes. The Council should consider these costs in a revised appraisal.</p> <p>We also note that policy ENV9 stipulates that development should achieve the "next level for minimum water efficiency from the Code for sustainable Homes". The Council has omitted to model the cost of this. This will add considerably to build costs.</p> <p>The report has only modelled up to 40% affordable housing. It has not modelled the full requirements of policy H4 which requires 40% affordable housing and Low Cost Housing (we discuss this further below).</p>	<p>The Council must assess the effect of this policy requirement on viability, in accordance with the NPPF, to ensure that this policy will not render the plan undeliverable. We note that paragraph 6.65 that the Council considers that the entry-level discounts may have to be 10% to 15% lower than the open market value. If this is what is required then it will need to use these figures in its viability calculations. We note that on page 23 of the Crawley CIL, SHLAA and Affordable Housing Viability Assessment (October 2013) that the Council has modelled only 30% affordable housing plus 10% Low Cost Market housing valued at 15% discount from open market value. Policy H4, however, requires 40% affordable housing in addition to an element (unspecified) of Low Cost Market Housing.</p> <p>It is the responsibility of the plan-maker to demonstrate that its policies are viable, not the applicant. An applicant should be able to know that if s/he submits an application that accords with the development plan this can be approved without delay. Recourse to additional viability assessments is contrary to the principles of the plan-led system and positive planning.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>The report is unclear in the presentation of its information. For example on pages 34-36 it lists the results of its viability appraisal. However, it is unclear what rates of affordable housing these results relate to. Paragraph 6.3 implies that it does model 40% affordable housing but it is not altogether clear that this is the scenario that has been applied to the tables on pages 34-36.</p> <p>It is also unclear what the threshold land value is judged to be in each instance. We note that there are appendices to the document but the content has not been released. Unless third parties are able to see this information it is hard to judge whether the schemes are viable or whether the thresholds applied are realistic. As such, it is hard to judge whether 40% affordable housing does represent a realistic rate. Nevertheless, the table on page 34 indicates that not every scheme is viable. Out of the 3,018 dwellings that are planned to be provided in the first five years, we observe that some 480 will be made unviable as a consequence of the proposed local plan policy requirements. This would exceed one year's monitoring average (326 dpa). Once other costs are accounted for, such as the cost of moving to zero carbon homes, than we fear that many of the more marginal schemes (the ones in light green) could plunge into unviability.</p> <p>The policy requirement in relation to low cost market housing is unsound because it is unjustified and contrary to national planning policy.</p> <p>We note the requirement for the provision of low cost market housing in addition to 40% affordable housing on schemes of 15 or more dwellings. Policy H4 does not explain the mechanics of how this will work. The policy, consequently, lacks sufficient clarity to enable a decision maker to know how to determine an application (paragraph 155 of the NPPF) and therefore it is unsound. This lack of clarity would also conflict with paragraph 14 of the NPPF. We note that paragraph 6.65 states that an Affordable Housing SPD will explain the detailed mechanisms of how this policy requirement will be implemented but this would be contrary to the NPPF: paragraph 153 discourages the use of SPDs. Furthermore, SPDs should not be used where they add financial burdens to development. Clearly, a requirement for developers to sell some of the market element of the scheme at discounted prices would represent a financial imposition.</p> <p>If the Council is to pursue this policy, then it must clearly explain what is required in the local plan: what proportion of the homes of a scheme of 15 or more dwellings would need to be sold at discounted prices; how much of a discount (10 or 15% of market rates?); and precisely how this would be implemented (e.g. would the discount be expected to apply in perpetuity: i.e. when the owner came to sell, would his/her sales price have to continue the discount. Would there be any eligibility criteria restricting those who might wish to buy the discounted homes?).</p>	

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REP/050 (CSC2055768)	Persimmon Homes and Taylor Wimpey Ltd.	H4	<p>Policy H4: Affordable and Low Cost Housing</p> <p>Policy H4 requires 'Low Cost Housing' in addition to the provision of 40% affordable housing on developments of 15 dwellings or more. The supporting text to Policy H4 (paragraph 6.65) confirms that the introduction of Low Cost Homes is intended to create an additional tier of assistance to people entering the housing market for the first time.</p> <p>There is no explanation within the Policy or the supporting text as to how this requirement of H4 will be implemented and as such there is no mechanism through which decision-makers are able to determine compliance with this policy. Paragraph 6.65 simply refers to the Affordable Housing Supplementary Planning Document as the basis upon which this policy requirement will be delivered and implemented. Given the potential implications of such a requirement on the viability of development schemes, the lack of clarity in this policy is a serious concern. We refer to paragraph 173 of the NPPF deals with viability and deliverability in plan making. It states: - Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.</p> <p>Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.</p> <p>In respect of viability the Crawley Local Plan is supported by the Crawley CIL, SHLAA and Affordability Viability Assessment (October 2013). Within this report a Residential Viability Appraisal considers affordable housing requirements and provides a viability assessment based on two scenarios:</p> <ol style="list-style-type: none"> 1) 40% affordable; and 2) 30% affordable and 10% Low Cost housing. <p>However, no Viability appraisal was undertaken to reflect the policy requirement of 40% affordable housing 'plus low cost housing'.</p> <p>Consequently the policy requirement is not only deficient in terms of clarity of implementation it is also not supported by a viability appraisal, therefore the implications of the policy cannot be understood and this is contrary to the NPPF.</p> <p>In terms of Low Cost Housing the policy requirement is caveated with the concession that such requirements will be sought "where viability allows". This cannot be considered an effective strategy consistent with the requirements of the NPPF as it is</p>	

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			the responsibility of the Plan-maker to demonstrate that policies are viable. Policies must be deliverable and not simply aspirational reflecting untested requirements.	
REP/011 (CSC2054862)	Mrs. Natalie Bingham	H5	<p>I DONT THINK THE PLAN IS LEGALLY COMPLIANT AS THERE IS A COVENANT ON THE SITE EARMARKED FOR THE PERMANENT TRAVELLERS SITE STATING NO CARAVANS OR MOBILE DWELLINGS TO BE BUILT ON IT.</p> <p>I DONT THINK THE PLAN IS SOUND AS DOCUMENTS RELATING TO AN APPLICATION FOR THE SITE TO BE USED AS A RECYCLING CENTRE BACK IN 2005 WERE REJECTED AS THE ACCESS WAS UNSUITABLE " DUE TO THE POOR VISIBILITY AT THE ACCESS THE INCREASED TRAFFIC MOVEMENTS WOULD PREJUDICE HIGHWAY SAFETY.</p> <p>AND WSCC HIGHWAYS AND TRANSPORT SERVICES ALSO QUOTED "SERIOUS CONCERNS ABOUT THE CONTINUATION OF THIS UNAUTHORISED USE OF THIS PARTICULAR SITE. THE EXISTING ACCESS SERVING BUCHAN PARK KENNELS IS ONTO A FAST AND BUSY DOWNHILL DUAL CARRIAGEWAY SECTION OF THE CRAWLEY SOUTH WEST BYPASS WHICH FORMS PART OF THE STRATEGIC ROAD NETWORK.</p> <p>ALTHOUGH ACCESS IS JUST ADEQUATE FOR THE EXISTING LOW KEY USES THERE IS CONCERN ABOUT FURTHER USE WHICH WOULD CREATE AN INTENSIFICATION OF USE OF THIS ACCESS POINT PARTICULARLY BY SLOWER HGVs.</p> <p>THE EXISTING VISIBILITY TO THE RIGHT WHEN EMERGING IS MARGINAL DUE TO THE HORIZONTAL ALIGNMENT OF THE BYPASS AND THE VERY HIGH APPROACHING TRAFFIC SPEEDS ON THE DOWNHILL GRADIENT. THIS IS COMPOUNDED BY THE ACCESS WHICH IS FAIRLY TORTUOUSLY ALIGNED AND ON A STEEP GRADIENT.</p> <p>IT IS SUGGESTED THAT ANY INCREASED USE OF THE ACCESS WOULD BE UNACCEPTABLE FOR HIGHWAY SAFETY REASONS.</p> <p>RECOMMEND REFUSAL.</p> <p>I DONT THINK THE PLAN IS COMPLIANT WITH THE DUTY TO COOPERATE AS THE CONCERNS AND OBJECTIONS OF 1300 BROADFIELD RESIDENTS TO THE PROPOSED SITE HAVE BEEN IGNORED.</p>	<p>I THINK THAT BUCHAN PARK KENNELS IS UNSUITABLE FOR DEVELOPMENT OF A TRAVELLERS SITE AND IF THE SITE ACCESS WAS DEEMED "UNACCEPTABLE FOR HIGHWAY SAFETY REASONS" AND "THE INCREASED USE OF THE EXISTING ACCESS TO THE PUBLIC HIGHWAY WOULD ADD TO THE HAZARDS OF HIGHWAY USERS TO AN UNACCEPTABLE DEGREE" AND "THE ACCESS IS CONSIDERED DANGEROUS BEING DIRECTLY ONTO THE CRAWLEY SOUTH WEST BYPASS WITH VERY LIMITED VISIBILITY."</p> <p>THESE ARE DIRECT QUOTES FROM DOCUMENT DC/2741/04/CG AND FROM MINUTED FROM THE PLANNING COMMITTEE MEETING DATED 11TH OCTOBER 2005.</p> <p>I HAVE ATTACHED THEM FOR YOU TO PERUSE. IF THIS SITE ACCESS WAS UNSUITABLE IN 2005 I CANT UNDERSTAND WHY IT IS NOW SUITABLE AS THE TRAFFIC HAS INCREASED SINCE THEN AND WILL CONTINUE TO INCREASE SIGNIFICANTLY WHEN KILNWOOD VALE HOUSING DEVELOPMENT HAVE FINISHED BUILDING THEIR 2500 NEW HOMES A SHORT DISTANCE FROM THE SITE. WITHOUT SPENDING VAST AMOUNTS OF MONEY TO CHANGE THE ROAD LAYOUT I CANT SEE HOW THIS IS A SOUND AND LEGAL PROPOSAL.</p>
REP/026 (CSC2054950)	Mr. Richard A Flint	H5	<p>Adjacent to an Area of Outstanding Natural Beauty – Buchan Park</p> <p>The site has protected wildlife – Nightjar, Lizards.</p> <p>Should be retained as an Open Space – no development</p> <p>Has unsuitable Road Access – A264</p> <p>Development refused 2005 for various reasons including:</p> <p>Traffic volume A264,</p> <p>Road access onto a Dual Carriageway (70mph) bad visibility on a bend</p> <p>– Waste Recycling</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/004 (CSC2055173)	Mr. Alan Quirk	H5	<p>During 2004/5 Crawley Borough Council investigated over 20 sites in the Borough to see if any of them were suitable for development into a site for Traveling families. None were deemed suitable.</p> <p>This included the site now chosen at Broadfield Kennels.</p> <p>This site is isolated from the rest of Crawley (Broadfield) by a ring road, the A264. In 2004/05 the Highways Authority, West Sussex County Council, confirmed that in their view any development of the site, in this form, was not suitable, and Crawley Borough Council took the advice and did not pursue the matter.</p> <p>I understand that the current investigation of suitable sites concluded that the Kennels site was now suitable because the County Council raised no objections.</p> <p>I understand that the County Council did not reply when asked by Crawley about current suitability, and that Crawley have assumed that the County Council supports the site being used.</p> <p>I have seen no evidence that the County Council supports the proposal.</p> <p>The legislation for Traveling people includes a provision that any site needs to be close to amenities available to the resident population.</p> <p>In the case of the Kennels site it is on a raised location on the other side of the busy A264 road.</p> <p>Access is via a steep curved slope. Travellers can only exit the site on the same side of the road. To get to any part of Crawley (Broadfield) Travellers would have to undertake a circuitous journey of at least two miles. It is possible to walk to Crawley (Broadfield) by using a tunnel constructed under the A264 through to Broadfield. Currently the footpath is unmade mud and passes through a wooded area, total unsuitable for children attending school.</p> <p>Some estimates put the cost of making the site 'user friendly' at close to seven figures.</p> <p>The site is also at the top of a gradient.</p> <p>The report states that noise is a factor in choosing a site as Traveller caravans are poorly insulated against noise.</p> <p>The proposed site is one of the highest points of Crawley, will this attract greater noise?</p> <p>A couple of years ago, Travellers broke into the site and had to be removed.</p> <p>The caravans could be seen for miles and were regarded locally as a threat to the amenity value of the area.</p> <p>Alternative sites exist.</p> <p>The area known as the North East Sector of Crawley is being developed for housing. While it is currently near the airport and could be nearer should Gatwick get a second runway, room exists for a site, much more suitable for the traveller's needs.</p> <p>Noise might be a consideration, but as it is a transit site, and not for permanent occupation, and it is deemed suitable for the resident population to live in, consideration might be given to this option.</p> <p>In summary, the site included in the Local Plan represents a desperate attempt to include a site, even though it is totally unsuitable using any accepted measure.</p>	<p>Alternative sites exist.</p> <p>The area known as the North East Sector of Crawley is being developed for housing. While it is currently near the airport and could be nearer should Gatwick get a second runway, room exists for a site, much more suitable for the traveller's needs.</p> <p>Noise might be a consideration, but as it is a transit site, and not for permanent occupation, and it is deemed suitable for the resident population to live in, consideration might be given to this option.</p>

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REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council	H5	<p>MVDC welcomes the provision of a reserve site to meet identified needs for Gypsies, Travellers and Travelling Showpeople (GTTS). Policy H5 (criterion f) states that proposals for new GTTS sites will only be considered suitable if the proposed site 'meets an identified local need for Gypsy, Traveller and Travelling Showpeople accommodation'. The Planning Policy for Traveller Sites states that LPAs should determine applications for sites from any travellers and not just those with local connections (PTTS Policy H, para 22(e)) The implication is that cross-boundary need can be a valid consideration where an application is received for a new GTTS site. MVDC's Traveller Accommodation Assessment November 2013 identifies the following needs for gypsy, traveller and travelling showpeople's sites:</p> <ul style="list-style-type: none"> • Identified need 2012-2017: 28 additional Gypsy and Traveller pitches and 5 additional Travelling Showpeople's plots • Additional calculated need 2017-2027: 16 further Gypsy and Traveller pitches and 2 further Travelling Showpeople's plots. • Total additional need 2012-2027: 44 Gypsy and Traveller pitches and 7 Travelling Showpeople's plots <p>At the time of writing, MVDC has not yet identified sufficient suitable, deliverable sites to meet its identified need for GTTS sites. The high proportion of land within the Green Belt is a major constraint, as is a lack of landowners willing to propose available sites for this purpose. With this in mind, MVDC suggests that any definition of 'local need' for purposes of Policy H5 should not be restricted to GTTS families currently residing in Crawley Borough. Interpretation and implementation of this policy should maintain flexibility for ongoing co-operation between Districts and Boroughs in meeting this need.</p>	The Local Plan should include a definition of "local need" for purposes of Policy H5 which is sufficiently flexible to enable ongoing co-operation between Districts and Boroughs during the Local Plan period with respect to the provision of sites for Gypsies, Travellers and Travelling Showpeople.
REP/054 (CSC2055476)	Ms Cath Rose Reigate and Banstead Borough Council	H5	<p>Whilst we do not consider the plan itself to be unsound, we seek some further clarification about CBC's approach to this issue. We are supportive of the approach taken by CBC to assessing the accommodation needs of Gypsies, Travellers and Travelling Showpeople, and through joint working at the Gatwick Diamond level have shared our Traveller Accommodation Assessment (TAA) methodologies to help ensure complementarity.</p> <p>RBBC undertook a TAA in 2013, and is currently in the process of updating that study. Whilst - in line with the agreed approach across the Gatwick Diamond – we are committed to meeting our identified needs as far as possible, we have not yet been able to conclude whether sites can be allocated in RBBC to meet the full need identified within the TAA without compromising the purposes or integrity of the Green Belt. We recognise that CBC also faces a variety of constraints when it comes to the provision of traveller sites. We would therefore wish to continue to work together with</p>	We would suggest that Policy H5 or the reasoned justification be amended to make reference to joint/cross boundary working in relation to Gypsy and Traveller accommodation provision.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			CBC and other nearby authorities to understand how the needs of RBBC could be met in the event that we are unable to meet them within our own borough.	
REP/008 (CSC2055514)	Mr. Kevin Berry	H5	<p>The plan is not legally compliant as it does not adhere to the restrictive covenant WSX292507 that covers all the land and property in this area. Reference the address land at Target Hill Crawley. It stipulates clearly that (a) no caravan or house or other temporary building or erection of any kind suitable or adaptable for living or sleeping quarters for human beings shall be erected or placed on the property. This would include all forms of caravan and buildings to house or provide washing and cooking facilities that would be part of such a development.</p> <p>As part of the High Weald AONB and being as close as 100m to WSCC's Buchan Park this development is therefore in conflict with SNCI and SSSI designations of this area. As WSCC hold the freehold of the access road and the land behind Buchan Kennels. SSSI 'Site of Special Scientific Interest'. SSSI's are designated by Natural England and are considered to be the country's very best wildlife and geological sites. Such a development would not be in the aims of interest of the local community, green space and nationally such limited green sites in town and cities are being developed upon and hence being lost for future generations.</p> <p>Buchan Park's reclaimed heathland has been a site for Night jars that are a species on the RSPB Red list. That designation means 'Globally threatened' due to a fall in breeding pairs in the UK.</p> <p>http://www2.westsussex.gov.uk/leisureandtourism/prow/pdfs/buchan_country_park_management_plan_2014_2018.pdf</p> <p>Under the sustainability report page pg 265 CBC has always admitted that the site has difficulties and in my opinion should have been removed from the list of possible sites for the following reasons.</p> <p>In conjunction with section H5 the Buchan Kennels site is on the very busy A264. It joins the M23 to Crawley and Horsham via the A264 Horsham is also growing in size and traffic along the A264 has increased in numbers and subsequent noise levels. The land it self meets the road at the SE of the proposed site and the noise level is above that that is permitted for this proposed development.</p> <p>If any form of shielding and noise control was added that would take away hundreds of square metres from the proposed site.</p> <p>Bearing in mind the land behind it is not owned by CBC.</p> <p>Kilnwood Vale is 1.3 miles from the junction of the Buchan Kennels site on the A264. 2500 homes, say 5000 more car movements per day on top of the thousands recorded by WSCC and traffic surveys.</p> <p>The fact this site would be accessed off of this current very busy road and soon to be even busier, it restricts the development of this site for two reasons:</p> <ol style="list-style-type: none"> 1 The noise level 2 Access to and from the A264 would be unsafe 	<p>CBC has removed other sites from the plan due to noise levels from Gatwick.</p> <p>On the 2013 Sustainability Document (that is not being shared by CBC with this plan today) under the previous council other sites were deemed more suitable.</p> <p>Also the noise footprint of Gatwick will reduce by the time it is build. Older aircraft will be phased out and newer aircraft like the Dreamliner and airbus models are significantly quieter than older Boeing 737 and 747 aircraft. Other sites had more space to screen against noise than the Buchan Kennels Site. CBC has not considered the noise of the traffic in their plans.</p> <p>Other potential sites in Crawley are further away from motorways and major A roads.</p> <p>Buchan Kennels is not a suitable site for a gypsy and traveller site for the reasons of noise from the road, access to the A264 and due to the fact that the land is an AONB and is adjacent to a SSSI.</p> <p>Any attempts to protect the AONB and screen from noise will make the site potentially usable and in adjusting the road access physical screening from established residents further reduce the suitability of this site.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>The noise level of such a road is in excess of the permitted noise level (57dB) for a caravan and hence a travellers site.</p> <p>If screening was put into place due to the shape of the site, a narrow sliver running along a section of the A264 sufficient screening and sounds proofing would not allow the site to be as big as is required.</p> <p>Hence it is an unsuitable location.</p> <p>CBC has removed other sites from the plan due to noise levels from Gatwick; they have not considered noise levels from major road networks like the A264 and its link to the M23. WSCC refused a plan for a development in 2005 for a recycling unit on the Buchan kennels site based on the access off of the A264.</p> <p>CBC has claimed the cost to build the site would be £700,000 pounds as of 2014. The projected cost in 5 years' time would be in excess of £1 million pounds for 10 families. This does not take into account the cost of access off of the busy A264 road. WSCC and Horsham District both refused planning permission based on 'poor visibility at the access the increased traffic movements would prejudice highway safety'. This was in reference with planning application DC/2741/04 on the 11th of October 2005. It also stated it would 'prejudice the aims of the Strategic gap and quality of the AONB/ countryside.'</p> <p>It also drew attention to the comments made by WSCC in terms of highway safety in relation to the access to the site from the south west of the bypass. WSCC application DC/2741/04/CG to a Mr Brown, refused planning permission of this site in 2005 as under point 4</p> <p>'The proposal would generate an unacceptable increase in vehicular traffic entering and leaving the public highway to the detriment of public safety'.</p> <p>These facts appear to have been ignored or missed as this current proposal was put forward by CBC. For these reasons I believe it does not comply with the legal compliance as the sustainability appraisal identifies concerns that have not been addressed and it does not reflect environmental or social factors that were identified in the past.</p> <p>Under the duty to cooperate WSCC and Horsham have objected and overruled less substantial development on grounds of access in the past. CBC's plan has failed on the duty to cooperate as two major stakeholders have rejected similar developments in the past.</p> <p>The application was also a belated application and CBC's own sustainability report states 'Contamination: previous uses of site? Uncertain Impact (?)' this is because the site was used by Mr Brown and there are no records of what was left there.</p> <p>WSCC would have to provide access off of the A264, on an already busy and yet busier road. Traffic calming may help but physical access for towed vehicles and caravans would be detrimental to public safety. The cost to WSCC to change access and to make the approach safe for slower moving vehicles would cost hundreds of thousands of pounds at today's prices and potentially double the cost of the entire project.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/032 (CSC2055522)	Mr. Andrew Shaw High Weald AONB Unit	H5	<p>There is concern about the potential impacts that the proposal may have upon the AONB in this location.</p> <p>It is recognised that this is a reserve site, and the reference within the policy to the AONB Management Plan is welcomed.</p> <p>However it is considered that additional work to identify potential impacts and to identify appropriate site assessment and potential mitigation options is required. As proposed the site could potentially have severe impacts on the AONB which may not have been fully assessed prior to the sites identification.</p> <p>The Unit would be happy to assist in supporting this further work on this site.</p>	
REP/048 (CSC2055764)	Mr. John Lister Natural England	H5	<p>Policy H5 (Gypsy, Travellers and Travelling Showpeople Site at Broadfield Kennels) indicates that "Acceptable development of this site will include - appropriate design, layout and landscaping to ensure the requirements of the AONB Management Plan are satisfied and the impacts of development adjacent to the country park are mitigated. Both the landscape character and ecological value of the Broadfield Kennels site will be assessed, and any harmful impacts will be adequately mitigated if required".</p> <p>I trust this includes managing access to the adjoining BAP woodland.</p>	None suggested.
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council	H5	<p>Policy HS5: No further information has been received subsequent to the informal WSCC comments submitted to CBC (within the email dated 13th May 2014). The matters raised (sightlines/visibility from the access and accessibility to services) therefore remain applicable and will need to be considered in greater detail as part of any future planning application, in the same way as for any of the other proposed allocations. Whilst the potential need for third party land cannot be ruled out, in principle, sightlines and visibility splays onto the A264 would seem achievable to accord with the necessary standards. Similarly, a link onto the bridleway running along the south-eastern side of the site that leads to an underpass below the A264 would seem possible to achieve. Clearly the applicant would need to enter into discussions, if necessary, to secure any additional land.</p>	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	H5	<p>Policy H5 Gypsy, Travellers and Travelling Show people Site</p> <p>Gatwick supports the need for the inclusion of a Policy which makes provisions for the allocation of a Gypsy Traveller and Travelling Show People Site. However GAL considers the noise exposure levels proposed in policy H5 (a) are unacceptably high and could result in unacceptable impacts. The limits proposed are too high and GAL considers this to be unacceptable particularly given that the residential accommodation utilised by the travelling community cannot adequately be sound insulated and mitigated against noise exposure. We therefore do not support the Policy H5 as it is currently worded.</p> <p>GAL also seeks the removal of the final paragraph of the Policy HC5 regarding the issuing of a temporary planning consent for areas to be predicted to be noise affected at some point in the future. Gatwick considers that this could lead to difficulties securing that land in the future for use in association with a potential second runway. Gatwick has significant concerns about the difficulties that could arise by the</p>	<p>GAL also seeks the removal of the final paragraph of the Policy HC5 regarding the issuing of a temporary planning consent for areas to be predicted to be noise affected at some point in the future. Gatwick considers that this could lead to difficulties securing that land in the future for use in association with a potential second runway. Gatwick has significant concerns about the difficulties that could arise by the application of this policy within the safeguarded land as, based on experience elsewhere, it may lead to particular difficulties in subsequently obtaining vacant possession of the land which would add significant additional</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>application of this policy within the safeguarded land as, based on experience elsewhere, it may lead to particular difficulties in subsequently obtaining vacant possession of the land which would add significant additional complexity to and compromise the timely delivery of a second runway scheme which would be of national importance. This policy is thus contrary to policy.</p> <p>GAL seek complete removal of the last sentence of the supporting text in of para 6.78 of the Submission plan as GAL strongly objects to the consideration of affording temporary planning consent for such forms of housing sites.</p> <p>GAL does however support the text of para 6.33 which highlights the constraints existing for such housing accommodation on the safeguarded land zone and in areas which may be affected currently or in the future by noise nuisance.</p>	<p>complexity to and compromise the timely delivery of a second runway scheme which would be of national importance. This policy is thus contrary to policy.</p> <p>GAL seek complete removal of the last sentence of the supporting text in of para 6.78 of the Submission plan as GAL strongly objects to the consideration of affording temporary planning consent for such forms of housing sites.</p>
REP/033 (CSC2055843)	Horsham District Council	H5	<p>Gypsies and Travellers: The Crawley Borough Council Local Plan allocates land at Broadfield Kennels as a reserve Gypsy and Traveller site and would be 'developable' in 6-10 years if the need arises. Horsham District Council is supportive of the flexible approach taken to assessing proposal for new permanent or transit Gypsy, Traveller and Traveling Showpeople sites, especially the approach taken to locations that have high noise exposure. The Plans commitment to meeting the needs of the Gypsy, Traveller and Travelling Showpeople community within the Crawley Borough is supported.</p>	
REP/082 (CSC2055112)	Miss Sarah Fortnam		<p>Firstly whoever produced this form can't spell! Please has an l in it! Secondly I strongly disagree with ANY traveller sites and.....I think the proposal of using any green land for this purposes should be rejected and their are far more worthy causes which our society would benefit from. The area should be conserved and used to benefit everyone who contributes, it should be used by our children to learn about our environment.</p>	

Environment

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Village Conservation Area Advisory Committee)	ALL	This section has reviewed carefully a wide range of environmental pressures and developed policies to sustain Crawley as a place where people would wish to live. Incidentally it provides further evidence of the problems that would arise from an expanded airport (increasing: water stress; noise; air pollution; loss of countryside and risk of flooding) (See one of our other submissions).	
REP/007 (CSC2055494)	Mr. John Byng	ENV1	I believe the importance of the green areas around Crawley in providing access to the countryside and protection for AONBs and biodiversity is so great that the Local Plan should indicate clearly that a second runway at Gatwick would be unwelcome.	Many modifications would be required to indicate that a second runway would be incompatible with the environmental and sustainability aims of the plan.
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	ENV1	We support this policy.	
REP/053 (CSC2055429)	Miss Louise Richardson RSPB	ENV2	Though policies within the local plan on nature conservation and biodiversity (ENV1: Green Infrastructure and ENV2: Biodiversity) do state that the local and national ambitions to maintain and increase biodiversity are possible, this is only achievable by including urban initiatives (the Urban Biodiversity Action Plan as stated in paragraph 7.18 of the local plan). The means set out to achieve this are by embedding policy ENV2 in planning policy (paragraph 7.16) and by 'incorporating features to encourage biodiversity'. Yet, paragraph 7.17 highlights the areas of biodiversity within Crawley on the Local Plan Map as a small fraction of the town. Urban wildlife is not restricted to gardens and green spaces; it is located in every corner of Crawley. Why then are the areas of biodiversity opportunity so few and far between?	The whole of Crawley has the potential to increase biodiversity. By including bird boxes, swift bricks, raised gaps in fences and other simple and cost effective features within planning policy for new and existing properties, and maintaining habitable areas (no matter how small) it is possible for every built up area in Crawley to have just as much biodiversity potential as its green spaces. Therefore, a more open approach is needed to identify areas of biodiversity potential, which in turn would make the achievement of policies ENV1 and ENV2 far easier.
REP/005 (CSC2055592)	Mr. Richard Bucknall Tony Fullwood Associates	ENV2	By categorising areas of biodiversity a) to h) together as areas which will be conserved and enhanced where possible, the policy applies a blanket requirement to areas with national and local status. The policy also states that proposals which would result in significant harm to biodiversity will be refused unless one of two circumstances pertain (one of which includes the relocation of development). This does not accord with the NPPF's presumption in favour of development. The NPPF states that in assessing proposals, local planning authorities should distinguish between the hierarchy of international, national and locally designated sites, so that	Policy ENV2 must be reworded to ensure it is positively prepared and consistent with national policy.

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			protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks (Para 113).	
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	ENV2	We support this policy subject to some minor amendments for the reasons set out below. The document correctly outlines requirements to fulfil statutory duties with regard to biodiversity, seeking to avoid impacts from development and seeking opportunities to achieve net gains wherever possible. In terms of policy ENV2, we agree with the statements made within this but it would be useful to list rivers as a priority habitat to preserve. Rivers are an important habitat and act as an essential corridor for wildlife, and contribute towards the functioning of green infrastructure. It would be useful to reference this directly.	Rivers are an important habitat and act as an essential corridor for wildlife, and contribute towards the functioning of green infrastructure. It would be useful to reference this directly.
REP/056 (CSC2055429)	Miss Louise Richardson	ENV2	Though policies within the local plan on nature conservation and biodiversity (ENV1: Green Infrastructure and ENV2: Biodiversity) do state that the local and national ambitions to maintain and increase biodiversity are possible, this is only achievable by including urban initiatives (the Urban Biodiversity Action Plan as stated in paragraph 7.18 of the local plan). The means set out to achieve this are by embedding policy ENV2 in planning policy (paragraph 7.16) and by "incorporating features to encourage biodiversity". Yet, paragraph 7.17 highlights the areas of biodiversity within Crawley on the Local Plan Map as a small fraction of the town. Urban wildlife is not restricted to gardens and green spaces; it is located in every corner of Crawley. Why then are the areas of biodiversity opportunity so few and far between?	The whole of Crawley has the potential to increase biodiversity. By including bird boxes, swift bricks, raised gaps in fences and other simple and cost effective features within planning policy for new and existing properties, and maintaining habitable areas (no matter how small) it is possible for every built up area in Crawley to have just as much biodiversity potential as its green spaces. Therefore, a more open approach is needed to identify areas of biodiversity potential, which in turn would make the achievement of policies ENV1 and ENV2 far easier.
REP/072 (CSC2055889)	Wilky Group	ENV2	PLEASE SEE FULL REPRESENTATION AND SUPPORTING DOCUMENTS 1. Introduction and summary 2. Gatwick Green economic study (Deloitte) 3. Demand and market assessment (GHK) 4. Alternative sites assessment 5. Regional policy context 6. Development concept 7. Access and movement strategy 8. Flood risk assessment 9. Environmental baseline and utilities report 10. Sustainability checklist and strategy	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>11. Outline response to sustainable community strategies</p> <p>12. Employment generation and housing supply</p> <p>13. Delivery statement</p> <p>- Gatwick Green: Transformation and Rebalancing the Local Economy (GHK, April 2011)</p> <p>- Delivering smart growth and additionally (Savills and GHK, June 2010)</p> <p>- The Gatwick Green Consortium Response to draft Gatwick Master Plan consultation (The Gatwick Green Consortium, January 2012)</p> <p>(Documents listed here are too large to attach so electronic copies are saved separately)</p>	
REP/034 (CSC2054825)	Mr. Martin Hayward	ENV3	This area of ancient open space should be conserved for wildlife and continuous enjoyment by local residents and visitors.	
REP/035 (CSC2054885)	Mr. Peter Jordan	ENV3	1. I strongly approve of the designation of Ifield Brooks Meadows and Rusper Rd playing field as a Local Green Space (ENV3). This beautiful and tranquil area is easily accessible from residential areas and is well used as a recreational area by walkers. It is accessible at several points from the Ifield Village Conservation Area and is particularly suitable for circular walks.	
REP/020 (CSC2054899)	Mr. David Christensen	ENV3	<p>This plan meets the EXACT requirements to conform for the requirement for Local Green Space –</p> <ul style="list-style-type: none"> • being immediately adjacent to local housing; • used regularly for recreation; • extremely quiet and wildlife rich; • typical habitat and environment; • limited in total extent. 	
REP/059 (CSC2055282)	Mr. Richard Symonds The Ifield Society	ENV3	<p>I fully support ENV3 "Local Green Space" designation for Ifield Brook Meadows (see CH9 Submission) + (Statement of Community Involvement). This ENV3 policy is critically important for 3 primary reasons:</p> <p>(1) Ifield Brook Meadows is a unique area within the ancient Parish of Ifield, with its 1000 year history, going back to the Doomsday Book. It is a special area of recreation - not just for dog - walkers – rich in heritage, character and wildlife, enjoyed throughout the centuries, and must be conserved and enhanced for the present, and future generations.</p> <p>(2) This view regarding Ifield brook Meadows has been consistently expressed by the local community at every stage of the Crawley Local Plan and especially over the last 14 years with the West Sussex Local Structure Plan and Horsham District Council's Local Plan and JAPP.</p> <p>(3) Local residents, The Ifield Society (and others) have also opposed most strongly - and often bitterly - any suggestion by the Welbeck Consortium (and partners) that land "West of Ifield" can support a monstrous development of up to 3,500 houses</p>	No Change.

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			(See Topic Paper 5. Unmet needs). We are relieved to see that both Crawley and Horsham Councils agree.	
REP/010 (CSC2055384)	Mrs. Jillian Katherine Bell	ENV3	I strongly support the designation of Ifield Brook Meadows as a local green space. The area is highly valued by local residents as a place of recreation and for its wildlife and vegetation. It is accessible, well used and well worth preserving for future generations.	
REP/065 (CSC2055541)	Mrs. Anne Scutt	ENV3	I support the designation of Ifield Brook Meadows and Rusper Road Playing Fields as a Local Green Space for the reasons given in the plan. As a local resident I make use of and enjoy this area.	none
REP/024 (CSC2055547)	Mr. Brian Eastman	ENV3	I strongly support the proposal in the local plan to upgrade the protection of the meadows to the west of Ifield from The Rusper Road and the Ifield Conservation area as far as the Council boundary along the mill stream.	I would add to the support in the document that this side if Crawley is the only one that progresses from the urban environment to the farming environment which make it unique in the town. The intervening space in the meadows is well use as a walking and dog walking area.
REP/025 (CSC2055559)	Mrs. Jenny Frost Ifield Village Association (part of Ifield Village Conservation Area Advisory Committee)	ENV3	The designation of the Ifield Brook Meadows and the adjoining playing fields as a Local Green Space is strongly supported by IVA. The whole of the meadows (both northern and southern parts) are regarded as a 'hidden treasure' by local people. They are well used for country walks and for daily dog walking. Their value is that this is the only place where there is a progression from the urban residential areas to farmed countryside (As opposed to forest) around Crawley and as such is unique around the town. The meadows are also Sites of Nature Conservation Importance. The northern section of the meadows, falls within Ifield Village Conservation Area, and provides the rural setting for the Village. Designation of the whole of the meadows and the adjoining playing field as a Local Green Space would greatly enhance the rural setting and protect a much loved place. It would also leave a rural route between Ifield Village and Ifield Water Mill.	
REP/064 (CSC2055625)	Mr. Peter Temple-Smithson	ENV3	Adjoins meadows of Conservation Area, thus extending the rural setting of that area. Also provides a continuation of the Rural setting between Ifield Mill and the Mill Pond with the church. The flood plain to the Crawley side of the brook gives some protection to low lying houses of Ifield Village.	
REP/068 (CSC2055742)	Mr. William Geraint Thomas	ENV3	Clearly, the green space is adjacent to the area it serves being on the western side of Rusper Road and so being within easy walking distance of many if not most Ifield residents. There are also parking facilities next to the playing fields west of Rusper Road.	

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			<p>This green space has over recent years been demonstrably special to the local community and holds a particular local significance.</p> <p>The most recent evidence of this was a campaign to prevent the building of 150 houses in the Ifield Brook Meadows in the summer and autumn of 1998.</p> <p>An organisation called the Campaign for the Preservation of Rural Ifield (CPRI) was formed to spearhead the opposition to housing development. Highlights of the campaign included a demonstration of opposition on the Meadows in July 1998 by about 300 people and a substantial number of (often lengthy) individual written objections to Crawley Borough Council from Ifield residents as well as extensive press coverage. I still have written and photographic evidence of the campaign in a number of lever arch files.</p> <p>Crawley Borough Council eventually relented and focussed their attention on a new housing development in the 'North East Sector' - now Forge Wood.</p> <p>Ifield Brook Meadows and the Rusper Road Playing Fields are local in character in the sense that they are mainly used by local people.</p> <p>The playing fields are used by local sports clubs regularly and are also used for informal sporting activities. The Ifield Brook Meadows are used by many Ifield residents of all ages on a daily basis - and not just for dog walking. I see evidence of this from our bedroom windows which face west from Aldingbourne Close.</p> <p>As the map on page 83 shows, this is not an extensive tract of land: perhaps up to a kilometre from north to south and less than half a kilometre at its widest from east to west.</p>	
REP/005 (CSC2055592)	Mr. Richard Bucknall Tony Fullwood Associates	ENV4	<p>Policy ENV4 Open Space, Sport and Recreation seeks to protect existing open space unless it is surplus to requirements.</p> <p>Criterion (d) goes further by imposing a test already applied by policies elsewhere in the plan. However, these policies relating to significant nature conservation, historical or cultural value should be tested independently through other policies in the plan and balanced against the loss of land which is surplus to requirements.</p> <p>The current policy criterion (d) resembles a presumption against development and is inconsistent with the approach in NPPF.</p> <p>The reasoned justification to Policy ENV4 explains that the Open Space Assessment (2013) has identified the location, quantity and quality of open space.</p> <p>The accompanying map incorrectly shows land east of Street Hill as Natural Open Space.</p>	<p>Policy ENV 4 must be reworded to ensure it is positively prepared and consistent with national policy.</p> <p>Policy ENV 4(d) should be deleted.</p> <p>The Natural Open Space designation should be removed from land east of Street Hill</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/079 (CSC2055699)	Homes and Communities Agency	ENV4	<p>Policy ENV4: Open Space and Recreation</p> <p>3.17 The land at Tinsley Lane has been identified within the plan for 'Housing and Open Space'. The site incorporates not only sports provision in the form of football pitches but also Summersvere Wood, an area of ancient woodland, which as substantial opportunity for improvement and a greater level of public access. The HCA have invested a considerable sum of money in demonstrating that the land East of Tinsley Lane is deliverable in terms of access, landscaping, amenity and retention of the existing sporting facilities at the site. This has included a number of specialist reports and consultations with Sport England. These are discussed further in the supporting report supplied alongside and to be read in conjunction with this submission.</p> <p>3.18 Support: The HCA support the principles as set out in Policy ENV4 which seek to ensure a continued supply of open space, sport and recreational land. Specifically the provision of better quality sports sites. The HCA landholding at Tinsley Lane includes 4 sports pitches of limited quality. As part of the proposed redevelopment of this site, the number of sports pitches would be reduced, while the quality of the overall facility would be significantly increased. The HCA support the principles in the policy that allow for a practical approach to provide better quality sports provision to meet existing need and consider the policy sound.</p>	
REP/057 (CSC2055766)	Heidi Clarke Sport England	ENV4	<p>Emerging Local Plan- Crawley 2030</p> <p>Thank you for consulting Sport England on the above named document. Please find herein, Sport England's formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England's role is focussed exclusively on sport, although it is recognised that sport can, and does, play an important part in achieving wider social, community and economic benefits (most notably in the context of health). Sport England recognises the vital role that the planning system can play in assisting with the delivery of our strategy. In addition, the development of sport within a local area can provide sufficient benefits to assist local authorities with the implementation of Local Plans. In this, well designed and implemented planning policies for open space, sport and recreation are fundamental to deliver broader Government objectives.</p> <p>The National Planning Policy Framework requires each local planning authority to develop sound policies based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Paragraphs 73 of the NPPF states: Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</p> <p>It is Sport England's view that sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management.</p> <p>Sport England is not prescriptive on the precise form and wording of policies, but advises that stronger policy will result from attention to taking a clearly justified and positive approach to planning for sport. In this way, planning authorities will be able to demonstrate that policies have been positively prepared (based on objectively assessed needs), and are consistent with national policy (reflecting the NPPF), justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.</p> <p>In the context of the above, Sport England has assessed the Emerging Local Plan for Crawley against the above requirements and in accordance with paragraph's 73 and 74 of the NPPF. Sport England is supportive of policy ENV4 Open Space, Sport and Recreation because it is consistent with national policy in particular paragraph 74 of the NPPF.</p>	
REP/060 (CSC2052787)	Mr. Laurence Skinner	ENV5	<p>House builders should be required to use "A-rated" or better components e.g. Boilers, windows etc.</p> <p>Houses should be installed with solar water heating and solar PV panels where possible.</p> <p>Consideration should be given to charging electric cars - both communal and house-based charging points.</p> <p>Street lights should turn off in the small hours on minor roads to save electricity.</p>	
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	ENV6	<p>We support this policy.</p> <p>It is good to see under policy ENV6 Crawley have increased the standards (which include water efficiency) to 'excellent' under BREEAM (Page 93) and amending of the original policy which applied only to those proposals 1000sqm or more to all developments.</p> <p>The policies still refer to terms (Code for Sustainable Homes (CfSH) and BREEAM) which are to be replaced by government national standards, however this is acknowledged in section 7.49.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			Under Policy ENV9 Crawley have suggested they will exceed or seek the most onerous water efficiency measures proposed by the national standards for domestic properties as set by government when they come in - i.e. If it were assumed CfSH 3/4 equivalent were set (105l/p/d) then they would implement a requirement of 80l/p/d, this approach must be commended.	
REP/055 (CSC2055721)	Rapleys T&L Crawley LLP	ENV6	Policy ENV6: Sustainable Design and Construction The policy requires that new non-domestic buildings should adhere to BREEAM Excellent. We object to this requirement, as the standard is exceptionally high, and it does not take account of feasibility and viability issues in line with the NPPF (paragraph 96). Therefore, the first paragraph of the policy should be amended.	Suggested amendments to Policy ENV6: “...new non-domestic buildings should adhere to seek to achieve BREEAM Excellent Very Good, subject to feasibility and viability
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation	ENV6	The policy is unsound because it is contrary to the direction of national planning policy. The Council requires that all development is built to Code 3. This fails to reflect: a) the current cost of building homes given the more recent changes to the Building Regulations; and b) fails to reflect the Government’s intention to delete the Code as a national construction standard, as signalled by its Housing Standards Review. In the Government’s final proposals for implementing the Housing Standards Review, and the Written Ministerial Statement published on 13 March 2014, makes clear the Government’s intentions. In his statement before Parliament on the 13 March, the Minister commenting on the Housing Standards Review consultation said that: “The consultation made clear the Government’s intention that planning authorities should only use the standards emerging from the review process. The Government will issue a statement later this year when the new standards are published, which will explain how this policy will be implemented. This means that many of the requirements of the code for sustainable homes will be consolidated into building regulations, which would require substantial changes to the content of the current code, as well as a reconsideration of its role. In the light of this, the Government think that the current code will need to be wound down to coincide with the changes incorporating the new standards coming into force. The Government will make further announcements on the transitional arrangements, and the handling of legacy developments being built out to current code requirements.”	In view of the Government’s intentions we consider that it would be inappropriate to stipulate in a plan for the period 2015-30 compliance with a standard that will shortly become obsolete. Furthermore, we consider that it is inappropriate to require applicants to submit a Sustainability Statement. This is a matter for the Building Control department of the local council. So long as the applicant meets the Building Regulations then there is no need for an additional statement. We also consider that the requirement for Sustainability Statements conflicts with paragraph 98 of the NPPF. How the applicant achieves the Building Regulations will be matter for him/her to decide and for this to be approved by Building Control.
REP/050 (CSC2055768)	Persimmon Homes and Taylor Wimpey Ltd.	ENV6	Policy ENV6: Sustainable Design and Construction Policy ENV6 is unsound as it is inconsistent with the direction of national policy and effectively requires compliance with standards which the Government, through the housing Standards Review, has confirmed will be consolidated into Building Regulations. Therefore the standards identified in Policy ENV6 are due to be made	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>obsolete.</p> <p>The specific requirements identified in the bullet points to Policy ENV6 are overly prescriptive and unnecessary. The approach set out in Policy ENV6 seeks to introduce controls on the key matters which are to be dealt with by Building Control.</p> <p>It is not for the Local Plan to dictate what measures are to be employed on any particular scheme to meet the Building Regulation requirements. This policy should therefore be deleted.</p>	
REP/036 (CSC2052177)	Dr. Bill Temple-Pediani KTI Energy Limited	ENV7	<p>LP96 Decentralised Energy Study for Crawley Borough Council (2011) is overtaken by legislation introduced by the coalition Government since May 2011.</p> <p>In particular, s.110 of Localism Act 2011 and s.93-97 of National Planning Policy Framework 2012.</p> <p>The proper study which should take place today (2014) is of "decentralised electricity and heat networks" serving an energy catchment larger than that of just Crawley.</p> <p>In particular, the general finding of low-carbon Combined Heat & Power schemes is that the CHP station should be licensed by Ofgem to sell low-carbon electricity at its retail price otherwise the overall scheme is unlikely to be economically viable.</p> <p>That means net output should not be less than 50MW_e from one or more appropriate combinations of low-carbon fuels used to fire the CHP station.</p> <p>There then should follow statement of what is the exact purpose of that low-carbon CHP scheme.</p> <p>Explanation should be twofold as follows:-</p> <p>i) to reinforce the local electricity and heat network; and</p> <p>ii) to promote low-carbon economic growth which the Crawley Local Plan covers separately under Topic Paper 4: Economic Growth and Topic Paper 7: Climate Change: that is unacceptably confusing to the reader of the Local Plan.</p>	<p>The Crawley Local Plan should make direct reference where appropriate to "Technical Annex: Preliminary Guidance to Local Enterprise Partnerships on Development of Structural & Investment Fund Strategies" published by UK Government in April 2013.</p> <p>Thematic Objective 4 - Low Carbon sets out in para A2.16 the purpose of low-carbon generation and supply is to drive jobs and growth in a Low Carbon economy.</p> <p>While reference is made in the Local Plan to interpretation by C2C Local Enterprise Partnership of Thematic Objective 4 (pages 17 & 18) dated January 2014, KTI Energy Limited implores reference is made in the Local Plan to the original UK Government document because it is highly likely Crawley Borough Council will be able to request funds from the LEP for whatever low-carbon generation and supply infrastructure it will deem appropriate for installation within Gatwick Diamond (Including Gatwick Airport).</p>
REP/055 (CSC2055721)	T&L Crawley LLP Rapeleys	ENV7	<p>Policy ENV7: District Energy Networks</p> <p>We consider that the policy should not seek a new district heating and/or cooling network where there is no network in place. Such an aspirational requirement, where there is no feasibility or timescale for implementing a network, would place an unnecessary barrier for economic growth, which could potentially make development schemes unviable. Therefore, we object to the policy, as criterion ii) is unsound and should be deleted.</p>	
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	ENV7	<p>The policy is contrary to national policy.</p> <p>The Council cannot require that applicants connect to or contribute to the expansion of CHP and District Heating and Cooling networks. How an applicant will meet the current and future requirements of Part L of the Building Regulations will be a matter</p>	<p>An applicant cannot be made to contribute to the expansion of a network, or for the development to be made 'network ready'. This is no longer a planning matter and the policy should be deleted.</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>for him/her to decide. The Council cannot prescribe how this is achieved. This is no longer a planning matter but a matter for Building Control. This is made clear in the Written Ministerial Statement on the Building Regulations issued on the 13 March 2014.</p> <p>We also refer the Council to the Government's response to its consultation on its approach to zero carbon homes entitled: Next steps to zero carbon homes - Allowable Solutions, July 2014. In its conclusions the Government is clear that the most appropriate route by which house builders achieve the energy efficiency standards is a matter for the developer to decide (see paragraph 8).</p>	
REP/050 (CSC2055768)	Persimmon Homes and Taylor Wimpey Ltd.	ENV7	<p>Policy ENV7: District Energy Networks</p> <p>The policy is unsound as it conflicts with national policy. There is no basis for the requirement for major developments to connect to, or contribute to, the expansion of the District Energy Networks. It is for the applicant determine how proposals will satisfy the requirements of Buildings Regulations and not for the Local Plan process. The policy fails to consider the implications of the Housing Standards Review and the simple fact that this is no longer a planning matter.</p> <p>Furthermore, it is noted that one of the priority areas includes land at Forge Wood (formerly NES Crawley). However this site already benefits from an Outline planning permission and there is no requirement (and nor should there be) to contribute towards District Energy Networks. It is therefore unclear how the policy would be implemented in this area unless it is volunteered by the developer.</p> <p>In circumstances where additional sites come forward in the Policy H2 Forge Wood area it is also unclear what they are supposed to connect in to if the main Forge Wood commitments proceeds in its approved form.</p>	
REP/033 (CSC2055843)	Horsham District Council	ENV7	<p>Further to our discussions regarding the potential for renewable and decentralised energy in the area, we welcome the positive stance taken towards combating climate change and look forward to continuing to work closely with CBC in developing options for a decentralised energy network. Given the predicted rise in temperatures over the forthcoming years, particularly in the South East, HDC agree with the proposed approach to sustainable design and construction and have taken a similar approach through the HDPF in that we also encourage the use of measures to reduce energy use. The HDPF also supports the establishment of district heating networks within heat priority areas or near potential sources of waste energy and we are pleased to see that CBC have included the same approach.</p> <p>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</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>pro-active approach taken to water conservation and have again adopted a similar approach through the HDPF.</p> <p>We welcome the opportunity to work alongside Crawley Borough Council to seek acceptable outcomes on any identified cross boundary issues.</p>	
REP/066 (CSC2055283)	Mr. Mark Mathews Thames Water Utilities Ltd.	ENV8	<p>Thames Water support the policy in principle, but consider that the reference to sewer flooding in the policy could be improved.</p> <p>The NPPF states at paragraph 100 that a sequential approach should be used by local planning authorities to avoid inappropriate development in areas at risk of flooding. The NPPG sets out that this applies in areas to be at risk from forms of flooding other than from river and sea including from 'overwhelmed sewers and drainage systems'. Any flood risk policy should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided.</p> <p>This therefore increases the importance of Thames Water's representations regarding a specific water supply and sewerage infrastructure policy.</p>	Improve the reference to sewer flooding and include a specific policy on wastewater/sewerage infrastructure as suggested in relation to representations on Policy INF1.
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	ENV8	<p>We support this policy subject to some minor amendments for the reasons set out below.</p> <p>Surface water flooding is a particular issue within Crawley having the highest risk of surface water flooding in the County. The policy states adhering to CfSH and BREEAM surface water runoff rates for all new development, which we are pleased to note. However in light of the particular surface water issues this will not reduce the overall runoff totals within the Borough. We would strongly recommend, where necessary and feasible, new development reducing runoff below the Greenfield rate in order to reduce net runoff into the rivers.</p> <p>There are several examples of other Councils that are doing this including Ashford (Kent) (SuDS Supplementary Planning Document (SPD)) who has set zoned acceptable runoff rates for different development areas. This will reduce the runoff in the long-term. Dealing with runoff at specific sites would also help reduce the surface water risk if targeted to the areas of greatest risk.</p>	Taking into consideration the above, we would recommend the policy is amended as follows: "Ensure that peak run-off rates and annual volumes of run-off will be less than previous conditions for the development site (greenfield runoff rate), where necessary, and demonstrate the effective use and maintenance of SuDS, unless it can be proven that it is not technically feasible or financially viable".
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council	ENV8	Suggested modifications below.	Paragraph 7.63: To make clear WSCC's role in the site flood risk assessment process the following amendments to wording are suggested. "All housing sites identified in Local Plan Policy H2 have been found to be acceptable in terms of

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				<p>flood risk by Crawley BC. This follows early engagement on the Local Plan with the Environment Agency and West Sussex County Council (WSCC) who provided information on flood risk levels across the Crawley area from rivers, surface water and groundwater. Of the sites allocated by the Local Plan”.</p> <p>Paragraph 7.65: Further to the September 2014 consultation by Defra (upon encouraging SuDs in development through the existing planning process rather than through implementation of Schedule 3 of the Flood and Water Management Act (2010)) the following amendments to wording are suggested: “The Gatwick Water Cycle Study recognises surface water flooding as a material planning consideration, and recommends that sustainable drainage techniques should be implemented to control flood risk. As required by the Flood and Water Management Act (2010) the Department of Environment, Food and Rural Affairs (Defra) is drafting national standards for SuDS design that will apply across England and Wales, making SuDS a formal requirement of development. Further guidance on masterplanning SuDS into development is set out in ‘Water, People, Places’ prepared by the Lead Local Flood Authorities in the South East. If Schedule 3 of the Act is implemented West Sussex County Council will become the SuDS Approving Body and will be responsible for determining, adopting and maintenance of SuDS once the national SuDS guidance is adopted.”</p>
REP/060 (CSC2052787)	Mr. Laurence Skinner	ENV9	Rainwater harvesting should be the norm not the exception. Rainwater should be able to be used for watering gardens. Consideration of banning outside taps unless they are connected to captured rainwater rather than mains water. WCs should be required to be dual flush to assist in minimising water use.	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/081 (CSC2058553)	Arun District Council	ENV9	It is suggested that Policy ENV9 be amended slightly so that there is a clearer link to the table within the reasoned justification that includes the levels expected in Crawley against the expected Code levels, to ensure there is clarity and future proofing of the Plan once the Code for Sustainable Homes is phased out.	
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	ENV9	<p>The policy is unsound because it is: a) unjustified; and b) contrary to national policy.</p> <p>Firstly, we recommend that the Council deletes this policy in view of the Government's intention to abandon the Code for Sustainable Homes as a national standard. To require developers to meet what will be an obsolete standard would be contrary to national policy. In the Government's final proposals for implementing the Housing Standards Review, dated 12 September, the Government has re-affirmed its intention to delete the Code by consolidating elements in the Building Regulations. It is the Government's current intention to introduce an optional standard for water efficiency that goes further than the Building Regulations but which complements the Building Regulations, but the Government has made it clear that any authority wishing to adopt this higher standard will need to justify this and assess for its effect on development viability.</p> <p>Secondly, under current NPPF planning policy, if the Council wishes to stipulate that developers always meet the next highest level of the Code it will need to assess the cost of doing so for residential development, and particularly for developments in the first five years, in order to comply with footnote 11 to paragraph 47 of the NPPF. The Council has not done so in its viability assessment. It has only assessed the cost of building to Code 3. As such the policy is unjustified.</p>	
REP/050 (CSC2055768)	Persimmon Homes and Taylor Wimpey Ltd.	ENV9	<p>Policy ENV9: Tackling Water Stress</p> <p>This policy is reliant on compliance with achieving standards set for water efficiency in the Code for Sustainable Homes. The policy fails to recognise the Governments stated position as set out in the Housing Standards Review which effectively renders the Code for Sustainable Homes obsolete, by consolidating standards in to the Building Regulations.</p> <p>Where more onerous standards are sought, this should be set within the context of site viability and based on a clear justification as to why such requirements are in place. Policy ENV9 is not supported by any assessment on the viability of such requirements and therefore such standards cannot be justified.</p> <p>Furthermore, the relevance of the standards identified in the Policy is undermined by recognition within the supporting text (paragraph 7.75) that the Council would intend to replace its own standards with any new national standard that comes in.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			This provides uncertainty and scope for confusion. It is suggested that the policy is simply deleted to avoid unnecessary duplication between planning and building regulations.	
REP/023 (CSC2055633)	Mrs Jennifer Wilson Environment Agency	ENV9	Under Policy ENV9 Crawley have suggested they will exceed or seek the most onerous water efficiency measures proposed by the national standards for domestic properties as set by government when they come in – i.e. If it were assumed CfSH 3/4 equivalent were set (105l/p/d) then they would implement a requirement of 80l/p/d, this approach must be commended.	
REP/033 (CSC2055843)	Horsham District Council	ENV9	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 have again adopted a similar approach through the HDPF.	
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	ENV10	We support this policy.	
REP/007 (CSC2055494)	Mr. John Byng	ENV11	It is unclear what this sentence means. It might mean that the runway proposal would be governed by the figures indicated in the table. Or it might mean that the runway would cause noise in excess of the figures in the table. The noise contours on page 163 should also indicate whether they are maximum noise levels or average noise levels. The noise contours on page 118 are unnecessary in the context of this diagram and should be removed. The plan should be amended to show that the noise implications of a second runway would be unacceptable and so the runway proposal would be resisted.	See comments above. No specific wording offered.
REP/051 (CSC2055590)	Mr. David Payne Mineral Products Association (MPA)	ENV11	The policy should reflect the NPPF (para 123) and ensure that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses. This would also better reflect NPPF para 143 and West Sussex Minerals Local Plan Policy 37 regarding proper safeguarding of minerals rail depots, concrete batching plants and asphalt plants.	The policy (clause Aii) should require noise sensitive development to be planned, laid out and designed to take account of existing noise sources including industrial and transport sites, so as not to be likely to constrain ongoing operation or development of such sites.
REP/079 (CSC2055699)	Homes and Communities Agency	ENV11	Policy ENV11: Development and Noise 3.21 Comment: While there will invariably been circumstance where adjacent lands uses, most notably residential and commercial uses can conflict each other, there are	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>a number measures which can be taken to safeguard both the amenity of residential development and to protect the future of employment and safeguarded sites. The HCA support the practical approach in Policy ENV11 which acknowledges that there may be potential conflict but that these can, and should be, suitably addressed through measures of mitigation that can be controlled by the Council by way of planning condition. This is the approach set out within the NPPF, the HCA therefore consider the policy sound.</p> <p>3.22 The Tinsley Lane site borders the safeguarded Goods Yard which is a processing facility for recyclable materials which includes a railway siding from the mainline used to import and export materials. While this presents challenges in terms of neighbouring uses, it is not considered from the specialist expertise taken that either the existing or future use of the site would be restricted by residential development in the southern section of the Tinsley Lane site. This issue, along with the supporting evidence is discussed further within the supplementary Tinsley Lane Report provided as part of this representation.</p>	
REP/015 (CSC2055717)	CEMEX UK Operations Ltd.	ENV11	<p>Policy ENV11 sets out that noise sensitive uses proposed in areas exposed to noise or planned industrial or commercial sources will be permitted where it can be demonstrated that future users will not be exposed to an unacceptable noise impact that would result in a statutory nuisance. It is considered that this policy is unsound as it should go further and require that any noise sensitive development is specifically planned, laid out and designed to take into account the existing industrial or commercial noise sources to minimise potential future conflicts.</p> <p>As set out in the representations to Policy H2, CEMEX UK Operations Ltd are concerned about the proximity of the Tinsley Lane site to Crawley Goods Yard and object to the proposed designation accordingly. There is a minimum distance of only 100 metres between the two sites. It is considered inappropriate to build more dwellings in Tinsley Lane, as the Goods Yard uses have not been designed to take these into account and therefore there is likely to be a conflict between the new residential development and the existing employment uses. Ensuring that the existing businesses are not impacted on from this new residential development is essential. This approach is supported by the National Planning Policy Framework (NPPF) which recognises the importance of safeguarding existing railheads and sets out that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established. **See separate sheet**</p>	<p>Insert the following into additional text into part A (ii): 'Noise sensitive development must be specifically planned, laid out and designed to take into account the existing industrial or commercial noise sources to minimise potential future conflicts'</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/002 (CSC2055736)	Aggregate Industries UK Limited	ENV11	<p>Policy ENV11 sets out that noise sensitive uses proposed in areas exposed to noise or planned industrial or commercial sources will be permitted where it can be demonstrated that future users will not be exposed to an unacceptable noise impact that would result in a statutory nuisance. It is considered that this policy is unsound as it should go further and require that any noise sensitive development is specifically planned, laid out and designed to take into account the existing industrial or commercial noise sources to minimise potential future conflicts. As set out in the representations to Policy H2, Aggregate Industries are concerned about the proximity of the Tinsley Lane site to Crawley Goods Yard and object to the proposed designation accordingly. There is a minimum distance of only 100 metres between the two sites. It is considered inappropriate to build more dwellings in Tinsley Lane, as the Goods Yard uses have not been designed to take these into account and therefore there is likely to be a conflict between the new residential development and the existing employment uses. Ensuring that the existing businesses are not impacted on from this new residential development is essential.</p> <p>This approach is supported by the National Planning Policy Framework (NPPF) which recognises the importance of safeguarding existing railheads and sets out that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>Notwithstanding the outright objection to the designation of Tinsley Lane, noise sensitive development should be specifically planned and designed to take into account surrounding industrial land uses including appropriate mitigation measures such as ensuring that a sufficient buffer between the two uses is provided, provision of acoustic fencing, noise bunds, non-opening double or triple glazed windows where required and sufficient sound insulation.</p>	<p>Insert the following into additional text into part A (ii):</p> <p>'Noise sensitive development must be specifically planned, laid out and designed to take into account the existing industrial or commercial noise sources to minimise potential future conflicts'</p>
REP/022 (CSC2056817)	Day Group Ltd.	ENV11	<p>Policy ENV11 sets out that noise sensitive uses proposed in areas exposed to noise or planned industrial or commercial sources will be permitted where it can be demonstrated that future users will not be exposed to an unacceptable noise impact that would result in a statutory nuisance.</p> <p>It is considered that this policy is unsound as it should go further and require that any noise sensitive development is specifically planned, laid out and designed to take into account the existing industrial or commercial noise sources to minimise potential future conflicts.</p> <p>As set out in the representations to policy H2, Day Group are concerned about the proximity of the Tinsley Lane site to Crawley Goods Yard and object to the proposed designation accordingly. There is a minimum distance of only 100 metres between the</p>	<p>Insert the following into additional text into part A (ii):</p> <p>'Noise sensitive development must be specifically planned, laid out and designed to take into account the existing industrial or commercial noise sources to minimise potential future conflicts'</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>two sites. It is considered inappropriate to build more dwellings in Tinsley Lane as the Goods Yard uses have not been designed to take these into account and therefore there is likely to be a conflict between the new residential development and the existing employment uses. Ensuring that the existing businesses are not impacted on from this new residential development is essential. This approach is supported by the National Planning Policy Framework (NPPF) which recognises the importance of safeguarding existing railheads and sets out that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>Notwithstanding the outright objection to the designation of Tinsley Lane, noise sensitive development should be specifically planned and designed to take into account surrounding industrial land uses including appropriate mitigation measures such as ensuring that a sufficient buffer between the two uses is provided, provision of acoustic fencing, noise bunds, non-opening double or triple glazed windows where required and sufficient sound insulation.</p>	
REP/075 (CSC2055765)	Mr. Chris Owen West Sussex County Council	ENV11	<p>Policy ENV11: By way of background, the Noise Policy Statement for England and through the Noise Action Plans have placed an obligation on the County Council and the Borough Council to mitigate as much as possible noise from transport sources. Following the second round of noise mapping in 2012 Defra have released updated Noise Action Plans (https://www.gov.uk/government/publications/noise-action-plans-large-urban-areas-roads-and-railways) covering large urban areas with population over 100,000 - this now includes Crawley, major roads such as the M23 and the railways. The mapping has identified noise 'hotspots' which WSCC as the highway authority has to investigate to see if there are any actions it could take to mitigate such issues.</p> <p>There are several locations in Crawley identified as these Important Areas, and any new development will need to take into account these so as not to introduce new noise receptors. Policy ENV11 includes appropriate provisions in this respect but it should preferably make reference to the Noise Action Plan, particularly as this has identified Crawley as a major urban area with discrete noise hotspots.</p>	Policy ENV11 includes appropriate provisions in this respect but it should preferably make reference to the Noise Action Plan, particularly as this has identified Crawley as a major urban area with discrete noise hotspots.
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	ENV11	<p>ENV11 Noise and Development</p> <p>As a known noise generator GAL is committed to ensuring the community surrounding the airport is not exposed to unacceptable levels of noise nuisance and key to this is also ensuring that the adopted local planning practice supports the need to protect noise sensitive development, and to not consent such development close to a known or planned noise generating operation.</p> <p>GAL considers that in line with best planning practice, the Plan should continue to promote policies which seek to appropriately locate and avoid new noise sensitive</p>	<p>Suggested Changes to Policy ENV11</p> <p>A. Noise Sensitive Development</p> <p>i Noise Sensitive Development affected by noise from transport sources:</p> <p>Noise sensitive uses proposed in areas that are exposed to significant noise from existing or future</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>development away from existing noise generating sources, such as the airport, and not to permit new major noise generating development unless the need and benefits of the development outweigh any adverse environmental impacts.</p> <p>GAL therefore supports the inclusion of a policy in the plan that specifically considers noise generating and noise sensitive development. We also support the inclusion of a technical 'Noise Annex' that explains how the policy will be applied in relation to sound levels from air transport and other noise sources. But GAL has serious concerns that the thresholds set within the Annex for noise sensitive development in proximity to noise sources are too high.</p> <p>We also consider the policy as worded is confusing and does not reflect the 'significant adverse impact' test of NPPF Para 12. ("Planning policies and decision should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development.")</p> <p>Para i and ii in particular are confusing because on the one hand they state that development exposed to significant noise will be permitted but then they refer to unacceptable noise. The proposed wording in the box below is suggested to clarify and simplify the policy wording and bring it into compliance with the NPPF.</p>	<p>transport sources (air, road, rail and mixed sources) will only NOT be permitted where UNLESS it can be demonstrated that future users will not be exposed to an unacceptable noise impact. Levels set out in the Local Plan Noise Annex will establish if the proposal is acceptable in noise impact terms.</p> <p>(Make same change to para ii)</p> <p>Noise Generating Development</p> <p>Noise generating development will be permitted where it can be demonstrated that any nearby noise sensitive uses (as existing or planned) will not be exposed to LEVELS OF noise impact that will GIVE RISE TO SIGNIFICANT ADVERSE IMPACTS adversely affect the amenity on the amenity of users of surrounding noise sensitive premises . Proposals.</p> <p>The remainder of the policy is acceptable</p>

Infrastructure

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/069 (CSC2054543)	Mr. Ross Anthony The Theatres Trust	IN1	<p>The Trust is pleased that the Reasoned Justification of Policy IN1 in para 8.7 now includes include the term 'cultural facilities' in the description of infrastructure and the additional protection for the operation of existing infrastructure.</p> <p>The function of social, community and cultural infrastructure is to provide services and access to venues for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community. Your cultural facilities include theatres, cinema, halls, music venues (usually in pubs), museums, libraries, and galleries and it is important this important infrastructure is protected for the well-being of the local community.</p> <p>However, 'cultural facilities' was not included entry for 'infrastructure' in the glossary and we recommend this be amended for consistency and clarity.</p> <p>Please note that my answers to the soundness etc. of the plan only relate to this matter and an 'N/A' choice would be appropriate for future consultations.</p>	The term 'Cultural facilities' should be included in the entry for 'infrastructure' in the glossary for consistency and clarity with the description provided in Para 8.7.
REP/066 (CSC2055283)	Mr. Mark Mathews Thames Water Utilities Ltd.	IN1	PLEASE SEE SUPPORTING STATEMENT	<p>In order that the Local Plan is effective and compliant with national planning policy and guidance, we recommend that there should be a Policy dealing with water and sewerage infrastructure along the lines of the following: Proposed Water/Wastewater Infrastructure Policy: Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:</p> <ol style="list-style-type: none"> 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. <p>When there is a capacity problem and improvements in off-site infrastructure are not programmed by the water company, planning permission will only be granted where the developer sets out how the appropriate infrastructure improvements will be completed prior to occupation of the development. The development or expansion of water supply or waste water facilities will normally be permitted,</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</p> <p>Text along the following lines should be included to support the above proposed Policy:</p> <p>“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments.</p> <p>Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users.</p> <p>In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.</p> <p>The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p> <p>Such a policy/supporting text is important as sewerage and water undertakers have limited powers under the water industry act to prevent</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.
REP/003 (CSC2055473)	Mr. James Mclean Aberdeen Investments	IN1	We acknowledge the requirement for infrastructure to support new development proposals. We consider it important for the policy to be worded in such a way that it incorporates sufficient flexibility to reflect the viability and delivery of individual schemes to ensure that the requirements do not seek to increase the financial burden on schemes beyond which they can viably afford. This could otherwise frustrate delivery of much needed regeneration and could delay the delivery of other planning benefits associated with new development.	The policy should incorporate greater flexibility to ensure that the deliverability of sites is not compromised.
REP/055 (CSC2055721)	T&L Crawley LLP Rapleys	IN1	Policy IN1: Infrastructure Provision The first paragraph of the policy should be clarified and amended to ensure viability of development proposals in line with PPG. An amendment to this paragraph is necessary to ensure that there will be no unnecessary financial burden on development	Suggested amendment to the first paragraph of Policy IN1 "Development will be permitted where it is supported by the necessary infrastructure both on and off site, where it is directly related and fairly and reasonably related in scale and kind to the development, and would not have a severe detrimental impact on the existing infrastructure services."
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	IN1	Policy IN1 Community Infrastructure Levy GAL recognises that CBC will be introducing the Community Infrastructure Levy and that the airport will be subject to this levy in the future. We believe CIL will be subject to a standalone Public Consultation and Examination and as such GAL will reserve its specific comments until such a CIL Public Consultation is brought forward by Crawley Borough Council. GAL acknowledges the inclusion of CIL in Policy IN1 and in the supporting text of par 8.9. GAL seeks that Policy IN1 and the supporting text clearly distinguishes - for the understanding of developers - the application of CIL charges and when a S106 obligation would be required and that Policy IN1 clarifies that there will be no double charging i.e. both CIL and a S106 agreement being applied to the same development.	GAL seeks that Policy IN1 and the supporting text clearly distinguishes - for the understanding of developers - the application of CIL charges and when a S106 obligation would be required and that Policy IN1 clarifies that there will be no double charging i.e. both CIL and a S106 agreement being applied to the same development.
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	IN1	With respect to the funding of infrastructure, we note that the Council is currently examining how the Community Infrastructure Levy (CIL) and s106 agreements, or other similar mechanisms may be best utilised. The Local Plan notes that based on the research undertaken so far, the Council is proposing to use s106 Agreements, bonds and other mechanisms to deliver key infrastructure on strategic development sites.	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			In response to the above, the HA would request input into any mechanism for funding infrastructure, in particular a Community Infrastructure Levy (CIL) and the associated consultation. It will be necessary to demonstrate how any key schemes relating to the SRN will be funded and delivered. We would recommend that all potential funding sources are listed along with an estimate of the likelihood of acquiring funds from each source to demonstrate the funding viability and deliverability of infrastructure requirements.	
REP/062 (CSC2055844)	Sussex Police	IN1	<p>Sussex Police therefore welcome inclusion of Policy IN1 of the Local Plan, which seeks to provide necessary infrastructure to support new development. The reasoned justification given for this Policy is robust and sound, giving a wide definition of possible infrastructure including social infrastructure, community facilities, emergency services.</p> <p>However, to ensure that infrastructure needs are up to date and based on appropriate available evidence, it is recommended that the Infrastructure Plan (August 2014) be updated and modified to take account of all Sussex Police needs as set out in our representation of 28th August 2014. This will subsequently ensure that the evidence underpinning the Crawley Submission Local Plan (2015-2030) is sound and fully compliant with the Duty to Cooperate.</p>	
REP/017 (CSC2055846)	Crawley CCG	IN1	<p>Thank you for the opportunity of commenting on the draft Local Plan for Crawley up to 2031. The first thing we would like to say is that we were surprised and disappointed at the lack of specific reference to the importance of healthcare services and facilities in the Borough and the need to make these sustainable over the lifetime of the Plan. As you may know there has been a high level of great partnership and development work with the Council undertaken by the CCG and its predecessor health organisations in Crawley over the past 12 years. We think that the Council should be giving significant weight to health services and facilities in the same way that it has sent out ambitious plans for economic regeneration and sustainability around for example, Manor Royal and Gatwick. The recently refreshed Joint Strategic Needs Assessment published by WSCC Public Health has confirmed that the population in West Sussex is both growing and aging and is likely to increase by around 10% across the county. This will bring additional challenges and pressures within the health system locally in Crawley particularly in relation to long-term conditions, aging frailty, mental health and dementia. It is important that the implications of these conditions and the responses required of all agencies are recognised in the Plan.</p> <p>The recently published Community Survey for West Sussex [2014] identified the following key features 'what constitutes a good place to live and what needs improving'.</p> <p>The top 5 most important things for making somewhere a good place to live were:</p> <ul style="list-style-type: none"> • Health services (47%) 	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<ul style="list-style-type: none"> • Crime levels (44%) • Transport links (41%) • Affordable housing (38%) • Clean streets (37%) <p>The top 5 things people said needed improving</p> <ul style="list-style-type: none"> • Facilities for young people (24%) • Transport links (19%) • Other (19%) parking and roads frequently cited • Shopping facilities (19%) • Affordable housing (18%) <p>Clearly the plan intends to make significant progress in all these areas and it will be important to strike the right balance in relation to health facilities and services in order to complement the very real improvements and developments which CBC wishes to achieve which are very much supported by the CCG. All these factors contribute to health and well-being and the NHS and the Borough need to work collaboratively with other partners to bring about parallel improvements in health status, improved lifestyle, self-management of long-term illness within the context of the economic, environmental, transport and housing proposals in the Plan.</p> <p>Turning to the question of specific issues, we note that the housing growth requirement for the Borough envisages the need for just over 8000 new houses of which 4895 are intended to be built up to 2031. This includes 500 new dwellings in the town centre area. It will be important for CBC to continue to work with the CCG and wider NHS organisations to ensure that there is sufficient capacity to meet the needs of what might be up 20,000 new residents. We also note that 30% of employed people in the Crawley area commute into the Borough for work which brings additional expectations in relation to access to local health services. The development of Kilnwood Vale [identified in the Plan as a new neighbourhood] coupled with Forge Wood are current examples of good partnership working and also the need for on-going partnership working and joint planning. Should the Gatwick second runway be approved then this collaborative approach will be even more important. The assessment of future housing requirement is just over 3000 houses short of the overall target and it will be important to understand where the Council envisages these houses being provided. The plans suggest to the west and northwest of Crawley and the CCG would want early discussions about these proposals as they emerge. The CCG is aware of previous discussions about a potential housing development in Ifield West though this is not specifically referred to in the Plan.</p>	

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REP/008 (CSC2055883)	Mr. Graham Berry	IN1	<p>2) 40 years ago the Balcombe Road was to be dual carriage way this was promised by WSCC please put pressure to reinstate this</p> <p>3) From Worth/Pound Hill it can take over an Hour (At peak time)to get into Crawley town centre by car</p> <p>4) Peak time I see from the Worth Way Footbridge over the M23 both Balcombe Road & Turners Hill Road Grid Locked/blocked back from Three bridges Station. The existing Link road cannot cope now; let alone before building of dwellings is completed near Steer Lane. Why not open the bridge from Maidenbower to Tilgate to take pressure off Three Bridges Station & Link Road.</p> <p>5) There is no detail of your proposals About road improvements to areas where employment will be created & increased</p>	
REP/033 (CSC2055843)	Horsham DC	IN1	<p>Infrastructure</p> <p>Horsham District Councils is supportive of the approach taken towards providing sufficient infrastructure to support new growth and ensuring that developments do not cause unacceptable impacts in terms of increased congestion and pressure on existing infrastructure. Reference to the 'wider transport infrastructure enhancement' in paragraph 8.17, in particular is supported as this could relate to cross-boundary issues.</p>	
REP/049 (CSC2055743)	Mr James Walton Network Rail	IN1	<p>Thank you for consulting Network Rail on the proposed Crawley Local Plan. Having considered the details of the document I can advise that Network Rail wishes to make the following comments.</p> <p>Network Rail would like to raise a major area of concern regarding the Kilnwood Vale Joint Area Action Plan due to its location in relation to level crossings, which is discussed in detail below.</p> <p>In regards to the rest of the Local Plan and the proposals it makes Network Rail is generally supportive, in particular the support for transport improvements and an acknowledgement that funding is required from Developers in order to fund necessary infrastructure improvements. Network Rail would like to see this funding specifically applied to improving the safety and sustainability of the operational railway infrastructure, with particular emphasis on level crossings and station improvements. Detailed below are Network Rail's comments on the Local Plan, I would be grateful if the council could consider prior to finalising the Local Plan.</p> <p>Network Rail would like to see s106 and CIL monies from developers being allocated to improving safety and sustainability of the operational railway infrastructure, with particular emphasis on level crossings and station improvements.</p> <p>This ties in with Local Plan Policies IN1: Infrastructure Provision and IN5: The Location and Provision of New Infrastructure where IN5 states:</p>	

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			<p><i>"The council supports the provision of new or improved infrastructure in appropriate locations where facilities are required to support new development"</i> And IN1 states:</p> <p><i>"The council will seek to implement a Community Infrastructure Levy (CIL) through the relevant processes. Where appropriate and in line with the CIL regulations, s106 agreements will address site specific issues."</i></p> <p>Network Rail would therefore request that where new development is being undertaken in close proximity to level crossings, new or improved infrastructure is applied to those impacted level crossings. Whether it looks to replace the crossing, divert the crossing, or improve the safety of the current crossing, either directly by the developer (in consultation with Network Rail) or indirectly through CIL or s106 agreements.</p>	
REP/060 (CSC2052787)	Mr Laurence Skinner	IN2	Consideration should also be given to installing cabling for cable TV without the need for retrofitting.	
REP/049 (CSC2055743)	Mr. James Walton Network Rail	IN3	<p>Sustainable Transport and Infrastructure Network Rail in principle supports Local Plan Policy IN3: Transport Statement and Assessment which states: "Development should be concentrated in locations where sustainable travel patterns can be achieved through the use of the existing transport network, including public transport routes and the cycling and walking network. Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety." And believes that this statement should be applied specifically to where routes cross the operational railway at level crossing.</p> <p>Network Rail would request in light of Appendix 2 and the following statement: "Developments will be permitted unless the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated." That any increased impact on level crossings be considered as severe. It would also be requested that Transport Statements and Assessments required by developments will have due consideration to the potential impacts of a development in close proximity to a level crossing. Network Rail would like to see s106 and CIL monies from developers being allocated to improving safety and sustainability of the operational railway infrastructure, with particular emphasis on level crossings and station improvements. This ties in with Local Plan Policies IN1: Infrastructure Provision and IN5: The Location and Provision of New Infrastructure where IN5A states: "The council supports the provision of new or improved infrastructure in appropriate locations where facilities are required to support new development" And IN1 states: "The council will seek to implement a Community Infrastructure Levy (CIL) through the relevant processes. Where</p>	

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			<p>appropriate and in line with the CIL regulations, s106 agreements will address site specific issues.”</p> <p>Network Rail would therefore request that where new development is being undertaken in close proximity to level crossings, new or improved infrastructure is applied to those impacted level crossings.</p> <p>Whether it looks to replace the crossing, divert the crossing, or improve the safety of the current crossing, either directly by the developer (in consultation with Network Rail) or indirectly through CIL or s106 agreements.</p>	
REP/061 (CSC2055748)	Katharine Harrison Surrey County Council	IN3	<p>Thank you for consulting the County Council on the above.</p> <p>Previously the County Council have responded to consultations to consistently express concern about the potential impact of growth on infrastructure provision within adjacent Surrey Districts, particularly regarding the possible impact which development in Crawley could have on the transport network in Surrey. We are pleased to see that our previous comments have been noted in the appendices to your consultation statement (2013) and that they have been taken forward to this submission document.</p>	The only comment we would add is that in order for the Local Plan to be effective and therefore sound, it is important that it is made clear that future transport assessments relating to the key development sites and employment opportunity areas examine the impacts on the transport network in adjoining local authority areas and, if these are forecast to be significant, then transport and highway improvements to mitigate these impacts will be agreed with those authorities, including Surrey County Council, and will need to be funded from developer contributions.
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	IN3	<p>Transport</p> <p>The general policy approach to transport currently adopted by the Council particularly in Chapter 8 of the Submission Plan is supported. Indeed that approach is reflective of the approach adopted by Gatwick Airport through our surface access strategy 'Access Gatwick'. It is our view that there are a number of other key topic papers that require cross references to transport policies in the Local Plan, including housing, employment and town centre growth. It is important that the Plan supports the objectives of the Gatwick Diamond but also contributes to the achievement of Gatwick Airport's surface access objectives.</p> <p>The very strategic nature of Gatwick Airport, as a major international gateway, requires local transport policies to facilitate access to it and its further development.</p> <p>The provision of high quality highway and public transport access is critical to the airport's success and thus the associated economic benefits it brings to the local area.</p> <p>In order to be sound a Local Plan has to identify the necessary infrastructure to support growth and how this will be delivered. A transport vision for Crawley should be contained in the Local Plan and should set out a list of transport challenges that need to be addressed in order of priority and proposed solutions to meet these challenges. This should be considered both in the context of being a facilitator of development in</p>	

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			<p>Crawley as well as needing to respond to the effects of it. Particular attention should be given to the airport as part of this with transport solutions being considered in a wider national, rather than local, context.</p> <p>Policy IN3 Sustainable Transport GALs commitment to both increasing the proportion of air passengers/staff using public transport and reducing the number of vehicular trips per passenger supports the adopted policy objective of reducing the need to travel and improving accessibility by sustainable travel modes.</p> <p>We believe that the Plan should encourage more sustainable modes of transport by providing attractive alternatives to the private car and where possible, encouraging car sharing.</p> <p>GAL supports Policy IN3 in promoting more sustainable forms of transport. This should reduce the amount of new highway infrastructure that would otherwise be required to meet such needs. Nonetheless extra resources are required to provide levels of service extensive enough to achieve strong modal shift. GAL is keen to play a central role in the debate about the provision of future sustainable transport options for users of the airport and where any resources to enhance such options may be best directed.</p>	
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	IN3	The HA are supportive of Policy IN3 which broadly meets the principles of the NPPF in terms of a presumption in favour of sustainable development.	
REP/033 (CSC2055843)	Horsham District Council	8.17	Horsham District Council is supportive of the approach taken towards providing sufficient infrastructure to support new growth and ensuring that developments do not cause unacceptable impacts in terms of increased congestion and pressure on existing infrastructure. Reference to the "wider transport infrastructure enhancement" in paragraph 8.17, in particular is supported as this could relate to cross-boundary issues.	
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	IN4	<p>The policy is unsound because it is ineffective.</p> <p>The detail relating to this policy is published in a separate SPD. This is contrary to paragraph 153 the NPPF which requires that policy is published in the local plan. SPD should be used sparingly and should not be used where it adds costs to development. That is the implication of this SPD. Parking and cycle parking standards will have cost implications. This needs to be tested as part of the plan-making process.</p>	
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	IN5	<p>The policy is unsound because it is ineffective.</p> <p>We recommend that this policy is amended to refer to the Council's CIL. We assume that the provision of the facilities required to implement this policy will be paid for by</p>	We recommend that this policy is amended to refer to the Council's CIL. We assume that the provision of the facilities required to implement this policy will be paid for by the CIL. The policy should

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>the CIL. The policy should make explicit the link between this policy and the Infrastructure Plan.</p> <p>It is necessary to raise this because the viability assessment is based upon residual S106 contributions of only £500 per dwelling. This strikes us to be low. We are concerned that there may be a gap in funding between what can be raised via the CIL and what can be raised via S106. This may cause problems for the implementation of the plan.</p>	make explicit the link between this policy and the Infrastructure Plan.
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	IN5	<p>Any key locations for infrastructure required to deliver the Local Plan should be identified.</p> <p>The HA request that any key schemes relating to the SRN detail how they will be funded and delivered. All potential funding sources should be listed along with an estimate of the likelihood of acquiring funds from each source to demonstrate the funding viability and deliverability of infrastructure requirements.</p>	
REP/049 (CSC2055743)	Mr James Walton Network Rail	IN5	<p>Network Rail would like to see s106 and CIL monies from developers being allocated to improving safety and sustainability of the operational railway infrastructure, with particular emphasis on level crossings and station improvements.</p> <p>This ties in with Local Plan Policies IN1: Infrastructure Provision and IN5: The Location and Provision of New Infrastructure where IN5 states: <i>"The council supports the provision of new or improved infrastructure in appropriate locations where facilities are required to support new development"</i></p> <p>And IN1 states: <i>"The council will seek to implement a Community Infrastructure Levy (CIL) through the relevant processes. Where appropriate and in line with the CIL regulations, s106 agreements will address site specific issues."</i></p> <p>Network Rail would therefore request that where new development is being undertaken in close proximity to level crossings, new or improved infrastructure is applied to those impacted level crossings. Whether it looks to replace the crossing, divert the crossing, or improve the safety of the current crossing, either directly by the developer (in consultation with Network Rail) or indirectly through CIL or s106 agreements.</p>	
REP/049 (CSC2055743)	Mr. James Walton Network Rail	IN6 8.29	<p>In Para. 8.29 possibly the wrong policy (Policy IN2) is referred to, given the context of the paragraph perhaps Policy IN3 - New Development and Requirements for Sustainable Transport should be referred to, as opposed to Policy IN2 - Strategic Delivery of Telecommunications Infrastructure.</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/049 (CSC2055743)	Mr. James Walton Network Rail	IN6	Rail Stations Network Rail supports the Local Plan Policy IN6 'Improving Rail Stations' and agrees that any new improvements or developments at or within the vicinity of railway stations should enhance the specific roles of the individual stations of Gatwick, Three Bridges, Crawley, and Ifield, as well as the sustainable access to those stations.	<p>However in regards to specific stations Network Rail believe the Local Plan could go further: Gatwick Station In regards to Section a) of IN6 referring specifically to Gatwick Station, Network Rail would request that the council go further and allow additional mixed commercial development to facilitate and provide funding for significant works to improve the station as an interchange for surface travellers using rail, coach, Fastway and other buses. Therefore it is requested that the policy should be updated to read: "at Gatwick Station, support its function as an airport - related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses, facilitated and funded by additional mixed commercial development."</p> <p>Crawley Station In regards to Section c) of IN6 referring specifically to Crawley Station Network Rail would request that the council go further and allow residential and mixed commercial development at the station to facilitate enhancements to the station to improve its integration with the town centre and bus station, and to emphasise it as an important transport hub. Therefore it is requested that the policy should be updated to read: "at Crawley Station, support its role as a major gateway to the Town Centre and improve its integration with the main shopping area and bus station facilitated by residential and mixed commercial development."</p>
REP/031 (CSC2055762)	Mr. James Stevens Home Builders Federation Ltd.	IN6	The policy is unsound because it is ineffective. We recommend that this policy is amended to refer to the Council's CIL. We assume that the provision of the facilities required to implement this policy will be paid for by the CIL. The policy should make explicit the link between this policy and the Infrastructure Plan.	We recommend that this policy is amended to refer to the Council's CIL. We assume that the provision of the facilities required to implement this policy will be paid for by the CIL. The policy should make explicit the link between this policy and the Infrastructure Plan.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			It is necessary to raise this because the viability assessment is based upon residual S106 contributions of only £500 per dwelling. This strikes us to be low. We are concerned that there may be a gap in funding between what can be raised via the CIL and what can be raised via S106. This may cause problems for the implementation of the plan.	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	IN6	<p>Surface Access</p> <p>Gatwick Airport wishes to play an active role in partnership with the public sector and other stakeholders in identifying the priorities for transport infrastructure improvements in the future. We see some of the main challenges to be as follows:</p> <ul style="list-style-type: none"> • Ensuring there is sufficient investment in the strategic highways network (Highway Agency) to meet Crawley's access requirements "we are seeking to agree a programme of highways improvements working with the HA in the development of the M25/M23 Route Management Strategy. • Enhancing road and rail connectivity to and from Crawley to facilitate employment growth, including proposed schemes for Brighton Mainline being brought forward by Network Rail through their Rail Utilisation Strategies for Control periods 5, 6, and 7. Improved public transport to major employment areas including the airport - we provide a dedicated public transport levy (fund) to help support key public transport services to and from the airport, a branded commuter product for staff travel and a published staff travel plan. <p>Gatwick has the busiest airport rail station in the UK with over 16 million rail users in 2014 (according to the Office of the Rail Regulator). We are continually working with Network Rail to strive for the rail stations improvements and recent successes include major track and signalling upgrades and a new platform delivered. GAL is also working with the Network Rail and Department for Transport to deliver the long term vision for the airport to create a completely new station concourse linked to the South Terminal. Such a scheme would contribute greatly to improving the accessibility and quality of airport access across the region. We would therefore welcome a delivery plan for transport for both local and strategic access to and within Crawley and the local planning policies which fully support the facilitation of such developments which contribute towards improving sustainable forms of transport.</p> <p>Gatwick broadly supports the objectives of Policy IN6 and specifically subsection a) of this Policy and seeks the promotion of a greater connectivity with Crawley.</p>	Gatwick broadly supports the objectives of Policy IN6 and specifically subsection a) of this Policy and seeks the promotion of a greater connectivity with Crawley.
REP/023 (CSC2055633)	Ms. Jennifer Wilson Environment Agency	IN7	This policy looks at the issue of crossovers but it does also need to set out the Council's policy on the paving over of front gardens to provide off-road parking. Also, the Council's position on the use of semi-permeable paving where possible. Increased hard surfacing increases surface water runoff which is to be avoided. As such we would recommend the policy is amended to include that only semi permeable and permeable paving will be supported in these instances.	Increased hard surfacing increases surface water runoff which is to be avoided. As such we would recommend the policy is amended to include that only semi permeable and permeable paving will be supported in these instances.

Gatwick Airport

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CSC2055843 REP/033	Horsham District Council	GAT1	HDC is supportive of CBC's overall approach to Gatwick and the associated policies regarding future change at the airport. We are pleased to see reference to the upcoming Airport's Commission consultation on UK runway expansion, and are mindful that both Horsham and Crawley's Local Plans may need to be reviewed early in the event of Gatwick Airport being selected by Government as the location for a new runway.	
REP/042 (CSC2055341)	Mr. Jack Straw Mole Valley District Council	9.6 9.13 9.18	Paragraphs 9.6, 9.13 and 9.18 suggest that Local Plan policies may need to be reviewed to reflect recommendations made by the Airports Commission about the future of Gatwick Airport. It would be more accurate to state that Local Plan policies may need to be reviewed in light of any Government decisions made in light of the Commission's recommendations.	It would be more accurate to state that Local Plan policies may need to be reviewed in light of any Government decisions made in light of the Commission's recommendations.
REP/077 (CSC2055532)	Mrs. Jane Wilson	GAT1	I would like to see Crawley prosper as a town but not become shadowed by the development of a second runway at Gatwick. Living next to Crawley and working in Crawley centre, I and my family (both children have bought houses in Maidenbower), value the quality of life offered. It would be a real shame if peace, quiet and countryside was lost to airport related development. There are already increases in road users and pollution, we need to ensure that the Crawley neighbourhoods do not become blighted by too much development. Let's focus on keeping a balance - a thriving one runway airport and a diversity of other business alongside quality of life. Thank you.	
REP/043 (CSC2055622)	Mr. Derek Meakings	GAT1	Have said no to the above boxes as I am in no position to say YES. Sirs, your vision of 2030 looks to be commendable goal providing the necessary funding from outside the town is obtained to achieve all of the necessary infrastructure improvements that are in already in many cases totally inadequate. My big concern is that most of the vision will be totally unachievable should a 2nd runway be developed, bringing only a small proportion of new jobs for existing residents with most new jobs going to inward migrants from the wider UK, the EU and commuters from all over the SE. With an airport the size of Heathrow under 2 miles from Queens Square, increased traffic, passengers, 45000 new houses in the area, there is absolutely no way Crawley will be able to avoid becoming just like all the previously green towns around Heathrow. Crawley will become congested, polluted and urbanised with no green spaces and no green belt, just like the towns around Heathrow. Sincerely hope you will be able to implement much of this existing Crawley 2030 plan, which will be extremely difficult even without a 2nd runway. Would you choose to live near Heathrow, then please ensure Crawley does not become like it.	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/079 (CSC2055699)	Homes and Communities Agency	GAT1	<p>Policy GAT1: Development of the Airport with a Single Runway</p> <p>3.19 Comment: The HCA note the provision of two policies in anticipation of the potential for either a second runway at Gatwick, or expansion of the existing airport. It should be made clearer through these policies what role the safeguarded land will play should a second runway not come forward and how this land could significantly contribute to either housing delivery or additional employment space.</p>	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	GAT1	<p>Policy GAT1 Development of the Airport</p> <p>GAL support the wording of Policy GAT1 as proposed given the current single runway configuration of the airport currently in operation.</p>	
REP/025 (CSC2055559)	Mrs Jenny Frost Ifield Village Association	GAT1	<p>This comment refers to the whole plan, not to a specific policy.</p> <p>We do not argue with much of the Local Plan. It appears to have done a comprehensive job of assembling the evidence base and laying out the facts about Crawley's current situation. It also (with the notable exception of the topic of the expansion of Gatwick Airport) does an apparently comprehensive job of drafting policies to address Crawley's needs.</p> <p>In fact in other submissions Ifield Village Association has supported specific policies that will enhance the town. However the plan does not address adequately the fact that a second runway built at Gatwick would make the vision of 2030 (para 2.13) unattainable. There appears be no 'plan B' should the government decide to put an additional runway at Gatwick. It is on this specific ground that we regard the plan as unsound.</p> <p>The document admits that the plan only refers to the airport not being extended (para 1.38), but does not argue that the Local Plan would be unachievable should the airport be expanded. It lacks the coherent overview that one would expect from a Plan.</p> <p>a. The need for a coherent overview</p> <p>Section 2 (pp 13 – 19) lays out the evidence for the challenges that Crawley faces based on its evidence base. It does not, however, summarise the key features which would help to give a concise coherent overview. It needs to be stated more clearly that:</p> <p>The Borough of Crawley is a fairly unusual place. Its key features could be summarised thus:</p>	<p>Summary of Unique features</p> <p>It would be possible to use the format above to give a summary, but it is also possible to roll these into paragraphs, by adding the following at the end of the section on Spatial Context in Chapter 2 – i.e. after 2.31 on page 13. This addition would involve the renumbering of paragraphs in the following section of the Plan.</p> <p>"Summary – Spatial context and its implication</p> <p>The evidence outlined in this section leads to a picture of Crawley as an unusual place. It is a town that is constrained within its boundaries with little space for further building. It has a shortage of housing for its present population, especially for those requiring affordable housing. It generates more jobs than are needed by its population, and hence has a net inflow of workers.</p> <p>This causes congestion on the roads, both in and around the town, at commuting periods in the morning and evening. Gatwick Airport is the largest employer in the town, supplying a high proportion of lowpaid jobs.</p> <p>There are two implications of this scenario. First, Crawley's surplus of jobs, deficit of housing, constrained boundaries and dependence on workers from surrounding areas are responsible for heavy commuting and consequent road</p>

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>1. Crawley is constrained tightly within its boundaries with very little room for further building.</p> <p>2. Crawley has a shortage of housing to meet the needs of its present residents.</p> <p>3. There is a particular shortage of affordable housing.</p> <p>4. Crawley's industries generate more jobs than are needed by its residents.</p> <p>5. The surrounding authorities supply workers for Crawley, leading to a large net inflow of commuters.</p> <p>6. Crawley roads are severely congested during the morning and evening commuting periods.</p> <p>7. Gatwick Airport is the largest single employer, generating a large proportion of lowerpaid jobs.</p> <p>The implications of the above features are obvious:</p> <p>1. Crawley's surplus of jobs (4) deficit of housing (2) constrained boundaries (1) and dependence on workers from surrounding areas (5) are responsible for heavy commuting and consequent road congestion (6)</p> <p>2. Crawley's shortage of affordable housing (3) is exacerbated by the large proportion of low paid jobs generated by Gatwick Airport (7). This is already causing distress among those subject to the "bedroom tax" and among those waiting for social housing.</p> <p>b. The influence of Gatwick Expansion</p> <p>There is a serious gap in the Plan – the Council has failed to take a position on a second runway at Gatwick. It voted to wait for further information before making a decision. However, the draft Plan contains all the evidence needed to make this decision: it is obvious that a second runway would make all of the above problems worse.</p> <p>A second runway at Gatwick would:</p> <p>1. build on the "safeguarded" land, remove the green buffer between the town and the airport and remove any possibility of building further housing north of Pound Hill;</p> <p>2. greatly increase inward commuting;</p> <p>3. cause severe noise disruption to the northern parts of the town;</p> <p>4. create further pressure on transport links, both within the town and between the town and London;</p> <p>5. increase Gatwick's dominant position as the main employer;</p> <p>6. add to the proportion of lowpaid jobs and the demand for affordable housing;</p>	<p>congestion. Second, Crawley's shortage of affordable housing is exacerbated by the large proportion of lowpaid jobs generated by Gatwick Airport. This is already causing distress among those subject to the "bedroom tax" and among those waiting for social housing."</p> <p>Add the following policy and reasoned justification in chapter 9 to address the impact of a second runway.</p> <p>"Policy GAT5: Impact of a second runway While respecting its duty to cooperate CBC will take every opportunity offered in consultations to argue against the development of a second runway at Gatwick.</p> <p>Reasoned Justification</p> <p>A second runway at Gatwick would build on the "safeguarded" land, remove the green buffer between the town and the airport and remove any possibility of building further housing north of Pound Hill. It would greatly increase inward commuting, cause severe noise disruption to the northern parts of the town and create further pressure on transport links, both within the town and between the town and London. It would increase Gatwick's dominant position as the main employer; and add to the proportion of lowpaid jobs and the demand for affordable housing. Urbanisation of the surrounding countryside would occur. Crawley could no longer be described as 'a town in the countryside', i.e. its policies referred to in paragraph 2.11 would no longer be effective. Crawley would be unable to achieve its vision of 2030 if a second runway were built."</p>

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			<p>c. Conclusion</p> <ul style="list-style-type: none"> • The Plan should include a summary of the unique features of Crawley Borough. • The Plan should include a summary of the problems arising from those unique features. <ul style="list-style-type: none"> • The Plan should include a coherent strategy for addressing those problems. • The Plan is worthless while it fails to take a position on the largest issue to face Crawley in a generation: expansion of Gatwick Airport. • A decision against a second runway at Gatwick should be taken now and the Plan updated to include that decision. 	
REP/035 (CSC2054885)	Mr Peter Jordan	GAT1	<p>1. I strongly approve of the designation of Ifield Brooks Meadows and Rusper Rd playing field as a Local Green Space (ENV3). This beautiful and tranquil area is easily accessible from residential areas and is well used as a recreational area by walkers. It is accessible at several points from the Ifield Village Conservation Area and is particularly suitable for circular walks.</p> <p>2. The draft plan as a whole fails to demonstrate a strategy to address Crawley's problems. The problems are listed (surplus of jobs, shortage of housing, inward commuting of workers from neighbouring authorities, congested roads, lack of opportunity to build additional housing, etc.) However, although all these factors are mentioned, there is no overall strategy which addresses them as a whole or proposes a coherent approach.</p> <p>3. The plan is grossly deficient in failing to address the proposed expansion of Gatwick Airport. Because the council has opted for a "wait and see" position, the Plan is unable to say anything worthwhile about Gatwick Airport. This makes the Plan useless for the period up to 2030, as any decision on Gatwick will render it out of date.</p> <p>4. Crawley's problems mentioned in 2 would all be made worse by a second runway. The council should recognise this (since the Plan demonstrates that the evidence is already available) and vote against an expansion which would be in nobody's interests except Gatwick Airport Limited and its shareholders.</p>	Take a position against a second runway at Gatwick. Add a strategic summary to the plan so that it lists Crawley's main problems and proposes a coherent strategy to address them.
REP/030 (CSC2055631)	Mr C Heymann DPDS Consulting	GAT2	The uncertainty surrounding the expansion of Gatwick Airport means that certain sites need to be treated with a degree of flexibility to ensure that they are deliverable in the future, whatever the Government's final decision. The information set out below refers to a particular site where such a flexible land use allocation strategy should be adopted.	The Local Plan currently identifies a site located between Steers Lane, Balcombe Road and Radford Road as part of the north east sector for housing development (Policy H2), however whilst this allocation is welcomed by the land owner and which he wishes to see retained within the Local Plan, there

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
				<p>also needs to be recognition that a potential second runway at Gatwick Airport would subsequently blight the site for residential development due to noise implications due to the site sitting adjacent to the airport safeguarding zone (Policy GAT2)</p> <p>In the scenario that Gatwick Airport becomes the Governments preferred option for expansion, the potential for airport use or airport compatible uses should be recognised and kept as an option in order to adopt a realistic and pragmatic approach to delivery of development on the site.</p> <p>Obviously should Gatwick Airports current bid fail then the sites residential potential would be realised. Our clients have discussed such proposals with members of Gatwick Airports expansion bid team, who agree with this approach as they would not wish to see applications made for residential development in such close proximity to an expanded airport for obvious reasons. Our client wishes to work collaboratively with key stakeholders within the local area and it is considered this flexible approach to land use allocation on this site would future proof the plan and allow for such circumstances to be taken into consideration in the compilation of housing delivery figures within the Borough.</p> <p>DPDS would be happy to elaborate the above information if required however at this time on behalf of our client respectfully request that the Local Plan Map and appropriate policies are modified to take into consideration the scenario set out above and so to ensure that the Local Plan is sound in terms</p>

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				of deliverability and not out of date as soon as it is adopted.
REP/079 (CSC2055699)	Homes and Communities Agency	GAT2	<p>Policy GAT2: Safeguarded Land</p> <p>3.20 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 and would provide additional land for either housing or employment land.</p>	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	GAT2	<p>Policy GAT 2 Safeguarded Land</p> <p>The Aviation Policy Framework requires that land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development in the period until adoption of a new National Policy Statement on Airports is brought forward by Government determining planning policy decisions on future airport development.</p> <p>The Government is now in the process of reviewing aviation policy and has set up an independent Airports Commission under the chairmanship of Sir Howard Davies. The commission's role is to identify and evaluate how any need for additional capacity in the UK should be met in the short, medium and long term.</p> <p>To support the work of the Airports Commission GAL has made clear its intention to investigate the options for the development of a second runway at the Airport and the option for a twin runway configuration at Gatwick has now been short listed by the Airport Commission. As such and pending the review of national policy, there is the policy requirement to continue to safeguard the identified land in order to ensure that the option for future runway development is not prejudiced or compromised by new development.</p> <p>GAL supports the Plan in continuing to include the Policy GAT2 which safeguards land at Gatwick Airport for a possible wide spaced second runway post 2019. This policy also ensures that other development in the borough does not compromise or prejudice such future potential development. Such an approach is consistent with current national aviation policy to safeguard land for a second runway at Gatwick, pending any decisions that may be taken by the UK government in the national interest following any recommendation by the Airports Commission in 2015. GAL strongly supports the proposed Policy GAT2 and associated supporting text in para 9.16 -9.19.</p> <p>It should be noted that the requirement to safeguard for the option for a second wide spaced mixed mode runway has wider implications than simply safeguarding the</p>	<p>GAL believes that a specific Aerodrome Safeguarding policy inclusion would be far more appropriate and robust than just the proposed supporting text in 9.20 of the Plan.</p> <p>To conclude GAL considers that as land is currently actively safeguarded from development is also necessary to provide a local policy to safeguard the current operation and potential future aerodrome operation. We seek therefore that the policy is termed 'GAT2 Safeguarding Land & Operations'.</p> <p>The draft Policy GAT2 goes on to broadly identify minor works that may be permitted within the safeguarded area. Since the existing safeguarding policy was adopted in 2007 there have been a number of planning applications that have been considered against the current Policy G2. Based on this experience GAL considers it would be appropriate to seek to increase clarity in Policy GAT2 as to the precise nature of development which will and will not normally be accepted. 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.</p>

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			<p>physical area of land that would be required for such a development. Specifically the protection of the runway option has implications on the acceptability of noise sensitive development in nearby areas that might be subject to changes in exposure to aircraft noise outside the expanded airport boundary in the event a second runway was to be developed.</p> <p>Furthermore the safeguarding of the area of land which would be required to develop the airport in the future also results in a need to safeguard both the associated existing and safeguarded extended future aerodrome from inappropriate development (so called technical aerodrome safeguarding in accordance with the provisions of The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002). Gatwick believes that in addition to the supporting text proposed in para 9.20 the Plan should include a standalone Aerodrome Safeguarding policy addition. In this way clarity can be provided for developers with proposed developments within the 15km safeguarded zone surrounding the airport which may currently be under a development restriction. The inclusion of such an Aerodrome Safeguarding Policy would also satisfy the specific requirements of Technical Safeguarding Circular 01/2003 (Annex 2 para 28) for the inclusion within local plans of an aerodrome safeguarding policy. GAL believes that a specific Aerodrome Safeguarding policy inclusion would be far more appropriate and robust than just the proposed supporting text in 9.20 of the Plan.</p>	
REP/072 (CSC2055889)	Wilky Group Savills	GAT2	<p>PLEASE SEE FULL REPRESENTATION AND SUPPORTING EVIDENCE</p> <ol style="list-style-type: none"> 1. Introduction and summary 2. Gatwick Green economic study (Deloitte) 3. Demand and market assessment (GHK) 4. Alternative sites assessment 5. Regional policy context 6. Development concept 7. Access and movement strategy 8. Flood risk assessment 9. Environmental baseline and utilities report 10. Sustainability checklist and strategy 11. Outline response to sustainable community strategies 12. Employment generation and housing supply 13. Delivery statement <ul style="list-style-type: none"> - Gatwick Green: Transformation and Rebalancing the Local Economy (GHK, April 2011) - Delivering smart growth and additionally (Savills and GHK, June 2010) - The Gatwick Green Consortium Response to draft Gatwick Master Plan consultation (The Gatwick Green Consortium, January 2012) 	PLEASE SEE FULL REPRESENTATION AND SUPPORTING EVIDENCE

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			(Documents listed here are too large to attach so electronic copies are saved separately)	
REP/027 (CSC2055769)	Rita Burns Gatwick Airport	GAT3	<p>GAT3 Airport Related Car Parking For airport passengers and staff, our car parking strategy considers that future parking requirements should be provided within the airport site. GAL strongly supports the need for the Plan policy in restricting the need for any further off - airport related car parking development and is in agreement with the Policy GAT3.</p> <p>GAL has demonstrated that there is sufficient capacity for airport users to park on-airport and considers that off airport car parking is contrary to the overarching objectives of sustainable development; for example off airport car parking facilities frequently result in additional road trips by the very fact that they are off site. The creation of new off airport car parking also inhibits GAL's ability to achieve greater modal shift of passengers and staff towards the use of public transport. Off airport car parking hinders the ability to deliver improvements in sustainable travel.</p> <p>GAL has published its revised Airport Surface Access Strategy (ASAS) - Access Gatwick. This provides the strategy and vision for Gatwick's transport connectivity to 2030, including airport passenger and staff car parking requirements. The ASAS is aligned with the Gatwick Airport Master Plan (July 2012) and the growth of the airport as a single runway operation.</p> <p>The ASAS contains strategic priorities to deliver key objectives for public transport modal share at the airport:</p> <ul style="list-style-type: none"> • Achieving 40% public transport mode share for air passengers and staff by the time the airport reached 40 mppa; • Identifying feasible measures to achieve a stretch target of 45% public transport mode share once the 40% target of 40 mppa has been achieved. <p>Even assuming that the public transport mode share and stretch targets are met, as passenger numbers increase, there is a residual and increasing demand for parking for those passengers who choose to use the car. It is important that an attractive car parking offer is available on airport as a means of discouraging less sustainable car parking options which create additional car trips compared with park and fly, generate extra surface access journeys, congestion and CO2 emissions.</p> <p>The GAL Car Parking Strategy demonstrates that parking needs in the future can be met on airport. The predicted future growth of passengers at Gatwick Airport and the public transport mode share target can be achieved through a car parking provision on-airport, without prejudicing the current or future operational needs of the airport.</p> <p>The current Plan Policy GAT3 restricts all future new and replacement airport-related</p>	

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			parking to within the airport boundary, demonstrating the need for a sustainable approach to surface transport access to the airport. GAL fully supports policy GAT3 as is currently proposed and the control it places over any future airport-related car parking.	
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	GAT3	The policy to ensure that all new proposals must be justified by a demonstrable need is acceptable to the HA. Given the significant number of trips that are generated by Gatwick Airport, any additional parking proposals outside of the airport boundary would be of concern to the HA and the safe and efficient operation of the SRN.	
REP/001 (CSC2055715)	Airport Industrial Property Unit (AIPUT)	GAT4	Crawley Submission Local Plan Map The Airport Industrial Property Unit Trust (AIPUT) owns an interest in a number of industrial and warehouse units at two locations on the southern side of Gatwick Airport, namely the Gatwick Gate Industrial Estate and Viking House. These units form part of the area known as the Lowfield Heath Employment Area in the Crawley Submission Local Plan. AIPUT supports the inclusion of the Viking House Site within the boundary of Gatwick Airport upon the Crawley Submission Local Plan Map. The inclusion of the Viking House Site within the Airport boundary is consistent with the Gatwick Airport Masterplan 2012, prepared by the airport operator, which identifies the site as lying within the Airport boundary and for ancillary land uses/activities required to support the operation of the Airport. The inclusion of the Viking House Site within the Airport boundary is also consistent with Crawley Borough Council's Gatwick Airport Supplementary Planning Document, November 2008. Appendix 1 to this document shows the Site as being within the Airport boundary.	N/A
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited	GAT4	Policy GAT4 Employment Uses at Gatwick This proposed policy in the Plan now reflects the position promoted by GAL to include scope for land and buildings within the airport boundary to be used for non-aviation related uses. GAL wholly supports the proposed GAT 4 objectives, along with a requirement that ensures that the long term operation of the airport is not prejudiced. GAL therefore supports Policy GAT4 in broadening its scope for allowing non-airport related commercial developments to come forward within the defined airport boundary, provided that such development would not prejudice the current and future operational requirements of the airport, nor policy objectives for Crawley Town Centre and Manor Royal. To conclude GAL fully support policy GAT4 and agrees with the principle of allowing greater flexibility for existing uses, in order to make more efficient and diverse use of land. Promoting sustainable economic growth is a key priority which is reflected in	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>national and local planning policy. The suggested GAT4 policy will achieve this priority and the objectives of other national and local policies. GAL therefore strongly supports the proposed policy GAT 4 due to the significant economic benefit that can be created by allowing non-airport related commercial development of land and buildings 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 GAT 4 policy will also be tested against all other relevant policies in the Crawley Local Plan 2030 ensuring that any development that comes forward would be appropriate and sustainable.</p>	

Background Studies and Evidence Base Documents

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/029 (CSC2055795)	Mr. Nigel Walkden Highways Agency	IN3	<p>Transport Strategy Evidence Base</p> <p>We have also assessed the evidence in the Stage 2 Transport Assessment (2012) ('Crawley Borough Council Local Plan Transport Strategy LPTS Stage 2 Report' dated August 2014) included on Crawley's website as supporting evidence for the Local Plan submission. We have the following comments in relation to this evidence in support of the Local Plan. (See attached table within email)</p> <p>Conclusion We have some concerns over the transport modelling in support of the Local Plan. There appears to be incomplete evidence and the missing gaps prevent the HA from supporting the Local Plan submission. As it stands, presently we cannot consider the transport evidence base as sound in terms of the NPPF test of soundness. The current transport evidence base is insufficient to consider the Local Plan 'justified' from a transport viewpoint.</p> <p>We would suggest meeting with Crawley Borough Council and West Sussex County Council as soon as is convenient to discuss our requirements for the transport assessment and other matters relating to transport modelling.</p> <p>In conclusion, it would appear that the policies set out in the draft Local Plan are broadly consistent with the NPPF, although in order to demonstrate soundness a robust evidence base will need to be further developed, as well as demonstrating how key infrastructure requirements can be funded.</p>	
REP/075 (CSC2055765)	Mr Chris Owen WSCC		<p>Transport Evidence Base</p> <p>The County Council supports the study work commissioned by CBC to assess the impacts of the proposed development allocations and establish that those impacts can be mitigated. The Crawley Local Plan Transport Strategy completed in November 2013 showed that, with appropriate mitigation measures in place, the development proposed in the Crawley 2030 Local Plan is capable of being delivered without unacceptable impacts on the County highway network.</p>	

Glossary

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/069 (CSC2054543)	Mr. Ross Anthony The Theatres Trust	IN1	<p>The Trust is pleased that the Reasoned Justification of Policy IN1 in para 8.7 now includes include the term 'cultural facilities' in the description of infrastructure and the additional protection for the operation of existing infrastructure.</p> <p>The function of social, community and cultural infrastructure is to provide services and access to venues for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community. Your cultural facilities include theatres, cinema, halls, music venues (usually in pubs), museums, libraries, and galleries and it is important this important infrastructure is protected for the well-being of the local community.</p> <p>However, 'cultural facilities' was not included entry for 'infrastructure' in the glossary and we recommend this be amended for consistency and clarity. Please note that my answers to the soundness etc. of the plan only relate to this matter and an 'N/A' choice would be appropriate for future consultations.</p>	The term 'Cultural facilities' should be included in the entry for 'infrastructure' in the glossary for consistency and clarity with the description provided in Para 8.7.

Noise Annex

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/027 (CSC2055769)	Rita Burns Gatwick Airport Limited		<p>Local Plan Noise Annex</p> <p>We consider that the thresholds set out in Table 1 of the Annex, for when noise sensitive development affected by noise from transport sources, are set at too high a level.</p> <p>We are therefore concerned that noise sensitive development will be permitted in locations where, even with mitigation, noise impacts would give rise to significant adverse effects on health and quality of life contrary to the NPPF and to good planning.</p> <p>In relation to aircraft noise the 57leq level is recognised to be the noise level marking the approximate onset of significant community annoyance (see for example para 3.17 the Aviation Policy Framework 2012).</p> <p>We therefore consider that the Lowest Observed Adverse Effect Level in Table 1 of the</p>	For the above reasons we consider that the Noise Annex should be reconsidered and specifically the thresholds set within Columns 3 and 4 of the last three rows of Table 1 should be amended along with the supplementary paragraphs 4.1.7 to 4.1.10.

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>Annex should be 57dBA Leq (not 45dBA).</p> <p>From 57dBA Leq upwards noise becomes noticeable and increasingly more intrusive and mitigation and reduction measures are appropriate.</p> <p>To comply with the Planning Practice Guidance the Observed Effect Level (OEL) should then be set in the range 57dBA to 66dBA Leq. Between these levels development (other than major noise sensitive development for the reasons set out below) is generally acceptable but effects should be mitigated and reduce to a minimum.</p> <p>We consider that the upper band of the OEL should be set at 66dBA leq. Above this level significant adverse effects occur such that new development should be avoided and prevented.</p> <p>The Significant Observed Adverse Effect Level (SOAEL) should therefore be set at 66dBA.</p> <p>The Unacceptable Adverse Effect Level (UAEL) is then considered to occur at levels greater than 66dBA Leq. New Development should be prevented because the effects are unacceptable.</p> <p>The justification for these thresholds lies primarily in the evidence of the effects of noise. Despite having been revoked PPG24: Planning and Noise was, in relation to aviation noise, evidence based. It reflected the finding of research and studies on the social attitudes to aircraft noise that were undertaken in the 1980s by the CAA (Aircraft Noise Index Study (ANIS) 1982). Whilst there is no more recent evidence to conclusively demonstrate that perceptions and responses have changed, more recent studies (e.g. the Attitudes to Aviation Noise from Aviation Sources in England study (ANASE, DfT 2007) do nevertheless indicate that sensitivity to noise appears to have increased in recent years.</p> <p>This would suggest that if anything there should be a tightening of standards rather than, as proposed in the noise Annex, a relaxation of standards.</p> <p>In any event the government continues to rely on the ANIS research, for example, in continuing to support the use of the 57dBA contour in the Aviation Policy Framework, so we question why the noise Annex also does not continue to rely on it as well.</p> <p>Contrary to Para 4.1.8 we therefore consider that, in the interests of good planning, unacceptable noise levels from aircraft noise occur at levels lower than the stated 69Leq.</p> <p>As per the previous, evidence based, advice in PPG 24 it is considered that:</p> <p>- 66Leq (57leq night) should be regarded as the maximum upper band for when minor</p>	

Reference	Respondent	Policy/ Para	Comments	Suggested Modifications
			<p>noise sensitive development is acceptable;</p> <ul style="list-style-type: none"> - Where noise is known or predicted to be between levels of 57 - 66leq (48-57 night) mitigation should be deployed (such as sound insulation). GAL's recently improved noise insulation scheme now covers properties exposed to noise levels from 60leq day. - However in the case of major noise sensitive development, as set out in Para. 8 of Annex 3 of PPG24, 60Leq should be regarded as the desirable upper limit. <p>The adoption of 66Leq was supported by the Secretary of State when granting planning permission for the North East Sector development in 2008 when conditions imposed prevents any new houses in areas above the future predicted 66leq contour. This decision was granted at a time when prospects of a second runway at Gatwick had diminished and therefore the weight attached to the noise impacts had diminished. But even this decision supports the use of 66leq rather than 69leq as the level above which new noise sensitive development should be avoided.</p> <p>In summary we consider that the OEL, UAEL and the SOAEL in the Noise Annex are set at too high. They would lead to noise sensitive development being exposed to unacceptable levels of aircraft noise.</p> <p>In summary a central tenet of good planning is managing compatible land uses and separating incompatible uses. Based on past studies it is contrary to good planning to now be allowing and relaxing policies on noise sensitive development in areas exposed to levels of noise, which are likely to give rise to significant adverse noise impacts on health and quality of life.</p> <p>For the above reasons we consider that the Noise Annex should be reconsidered and specifically the thresholds set within Columns 3 and 4 of the last three rows of Table 1 should be amended along with the supplementary paragraphs 4.1.7 to 4.1.10.</p>	