

Statement of Consultation

Appendix 8

Modifications 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	Alternative Learning Community Bewbush
Guinness Trust Housing Association	Roman Catholic Churches in Crawley	AMEC Environment & Infrastructure
Gulzar -E-Habib	RPS Planning Transport and Environment Ltd	BAPS Swaminarayan Santha
GVA		

Barton Willmore
 Black History Foundation
 Blue Cedar Homes Limited
 BME Ladies Health and Social Wellbeing Association
 Bodhisattva Buddhist Centre
 British Horse Society
 British Humanist Society
 Broadfield Christian Fellowship
 Broadfield Youth and Community Centre
 Campaign for Real Ale
 CBRichard Ellis
 Celtic & Irish Cultural Society
 Central Crawley Conservation Area Advisory Committee
 Central Sussex College
 Chagos Island Community Association (CICA)
 Chagos Islands Refugees group
 Chagossian Elderly West Sussex Group
 Charlwood Parish Council
 Churches Together in West Crawley
 Colgate Parish Council
 COPE
 County Mall
 Crawley Bangladeshi Welfare Association
 Crawley Baptist Church
 Crawley Borough Council
 Crawley Campaign Against Racism
 Crawley Clinical Commissioning Group
 Crawley Community Relations Forum
 Development Securities

Crawley Community Transport
 Crawley Community Voluntary Service
 Crawley Educational Institute
 Crawley Ethnic Minority Partnership
 Crawley Festival Committee
 Crawley Homelessness Forum
 Crawley Homes in Partnership (CHiP)-Tenants Database
 Crawley Interfaith Network
 Crawley International Mela Association (CIMA)
 Crawley Kashmiri Women's Welfare Association
 Crawley Mosque (Sunni Muslim) - c.f. Jamiat entry below
 Crawley Museum Society
 Crawley Older Person's Forum
 Crawley Portuguese Association
 Crawley Shop Mobility
 Crawley Tennis Club
 Crawley Town Access Group
 Crawley Wellbeing Team
 Crawley Young Persons Council
 Cycling Touring Club
 Darlton Warner Davis LLP
 Deloitte LLP
 Development Planning & Design Services Ltd
 Diego Garcian Society
 Divas Dance Club
 DMH Stallard LLP
 Drivers Jonas Deloitte

DTZ
 East Sussex County Council
 Eastern Stream
 Elim Church Crawley
 Equality & Human Rights Commission
 Firstplan
 Forestfield & Shrublands Cons. Area Adv Ctte
 Freedom Leisure
 Friends of Broadfield Park
 Friends of Goffs Park
 Friends, Families and Travellers
 Fusion Experience
 FusionOnline
 Gambian Society
 Gatwick Airport Limited
 Gatwick Diamond
 GL Hearn Ltd
 Gleeson Strategic Land
 Gurjar Hindu Union (GHU)
 Health Through Sport Action
 Heathrow Airport Holdings Limited
 High Weald AONB Unit
 Housing & Planning Directorate
 Housing 21
 Hunter Page Planning Ltd
 Hyde Housing Association
 Icen
 Ifield Park Care Home
 Ifield Village Conservation Area Advisory Committee
 Ikra Women & Children Learning Centre

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-Jafferyyah (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
Parish of Worth, Pound Hill and
Maidenbower
Parker Dann Limited

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

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
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
Ms L Flay
Mrs Harrington
Katie Vella

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
J Evans
Rob Horton
Clare Loader

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
Verity Colbert
Mr & Mrs Wall
Stella Daff

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
Mrs S Knight
Morgan O'Flanagan
Susan Lester

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
Suzanne Davies
Suzannah Guy
Sophie Airey

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
Alison Heine
Perry Doherty
Alison Shackell

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
Sally Thorn
Sally Osmond

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
Shayne Fensom
G V Sharp

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
Mrs Burgess
Natalie Sullivan

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
Rod Horton
Robert Rolfe
Robert MacPherson

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
Rebecca Betteridge
Rebecca Holt
Mr Burgess

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

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
Mrs Kathleen Cambridge
Julie Daly
Patricia Burrett

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 Chambers
Natalie Zevka
Mrs Natalie Moran

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
Michael Eaton
Michael Simmonds

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
Stuart Mason
Mary Gasson
Martyn Moore

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
Mrs Lynda Morgan
Lee Warner

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
Emma Challis
Ian Johnson

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
Laura Marden
Laura Hamilton

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
Mrs Linda Kelly
Kevin Grimshaw

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
Karen Pitt
Karen Eales

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
John Thompson-Balk
Jake Saul
Jaedon Mulligan

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 Thomsons
Jill Dunster
Jennie Walters
Jennie Parkes
Mrs Jennifer Sweeney
Jennifer Hord

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
James Senra

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
Gareth Gates
Jennifer Frost
David Roskilly

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
Greig van Outen
Kevin Greenfield
Graham Johnson

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

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
Elaine Dancaster
Dave Carter
Daria Czekajska

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
Diana Brown
D Wilbourn
W. Witsen Elias

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
David Christensen

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
Ciaran Barron
Mrs Beverley Bain
Beth Roskilly

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
Carrie Anne Campbell
Chris Smyth
Chris Jones

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
Beverly Clayden

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
Paul Ballard
Lin Ballard
Allan Lambert

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
Aisha Sidat
Ania Jasko
Angie Gasson

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
Miss Allanna Dwyer

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

PART 2

Representations

General Comments

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/048	Natural England	All	NC	NC	Dear Planning Team Thank you for consulting Natural England on the final changes to the Local Plan - we have no comments on the modifications. If discussion would be helpful, please give me a call. Yours sincerely		NC
REP/061	Surrey County Council	All	NC	NC	I am replying to the Consultation on behalf of Katharine Harrison Surrey County Council's Spatial Planning Team Leader. Please note that we have no comments on the modifications.. Thank you for consulting us.		NC
REP/041	Mr Colin Maughan	All	NC	NC	Dear Elizabeth, When I wrote to you about the Local Plan 2015-30 on 5 July I neglected to enclose your form, in spite of talking about it. The trees and "tree surgeons" issue is important, even though it is probably too late for my comments. Visually the proximity and architectural quality of Crawley trees is vital to our town. In its early days I visited Telford new Town, when there were no trees and it was an alarmingly inhuman environment. Now if you go, there are so many mature trees that you hardly notice the buildings. As I write, I am listening to Radio 4 and there is a distressing programme on about self service, including the provision of do-it yourself packaged furniture and sheds etc. it concluded by saying that that due to the introduction of the internet and this self-assembly trend (said to save somebody money) the High Street has no future, Hmm.		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/036	Dr Bill Temple - Pediani	Waste	NC	NC	<p>You know perfectly well your planning obligations under s.93-97 of National Planning Policy Framework and s.4 of National Planning Policy for Waste 2014 as they both apply to new properties planned within the remit of Crawley Borough Council and Horsham District Council.</p> <p>Do wish meet me to repeat them to respective Inspectors for the umpteenth time?</p>		NC
REP/106	Mrs Rambha Bhatt Gujarat Society	All	YES	YES	<p>The Crawley proposal for a new face look or a ugly part of Crawley's history Crawley town, be given full regeneration development. Allow, the development to be re-used but improve winter lighting and toilets. The proposal can go public as the public, as the public use Crawley town. Old with the new re-generation programmes, served by all ugly buildings pulled down. We need charming, better newer buildings, and safer streets. Toilets, cycling and disabled access for the travelling passengers. Ambulance, service men a well lighted Town. Italian style. Safer at night. Cyclist so they can drive past the town. Disabled access. Wheelchairs. The purpose of a Local Plan is to make Crawley, a new town, with better, street lighting, encourage tourists, toilets for kids, teenagers, a ethnic feeling, but a modern style. The children should love it. out with the new, but keep moral innovation. Trees, sitting areas, disabled people impaired, a social audiences. A marquee, or a newly build music park, kids area, mothers with prams, area A place where people can visit over and over, toilets, sand pit area. Cycles path eg. In china. cycle path. Parking area could be reduced zone times top priority. Sitting and observations area. Street lighting toilets. The ugly buildings has to go. There is problems in parking area and too much liberty takers. Cut the cost on fares.</p>	<p>A new town should be welcoming and not be competitive, selling. The cheapest brands should sell. Public buy, but not much in value. The shopping experience should be easy flow, and not a burden street lighting, easy parking no fees.</p> <p>Town Planning, should also be a happy experiences. Fun, happy and like Mickey mouse hello, and greet you. A happy shopping centre, creates, good vibes and spend more money. I don't like the buses, as they crowd the experience. Trees, walking space, a garden feel. I like open gardens, Chelsea flower show. Kew gardens, cheds gardens. Gandhi naghar gardens. A garden experiences and fragrance flowers. It must be special clean. The ugly buildings come down, and buses not allowed. Cycles, like in LA cycle path and a tunnel where kids bikes play under the tunnel. A visual virtual reality effect. Bikes can be used cycle path. Eg in china Hongkong. Drinking water supplies people need water.</p>	YES

Built Up Area Boundary Review 2015

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/098	Christine Tarry	Built Up Area Boundary 3.5 North of County Oak			I refer to Local Plan Built Up Area Boundary Review 2015 and would make the following comments regarding 3.5 North of County Oak: Your recommendation is that there should be no change as it conflicts with GP 3, 4 and 6. However, I disagree, as the land is adjacent to a built up area and has the A23 and Poles lane as defining boundaries and could therefore be included in the BUAB.		NC
REP/103	Mr Richard Handy Chair of Tilgate Community Forum	BUAB Review LP056 5-Tilgate Recreation Ground	NO	NO	Legal Compliance 1.2.2 The process of community involvement should be in accordance with the councils "statement of community Involvement". The council has supported the setting up of the Tilgate Community Forum to discuss matters of interest like this, but the forum has not been involved in discussing it. Soundness 2.1 The proposal is not justified because the recreation ground is not a continuation of the green space attached to Tilgate park. There is open green space both sides along this section of Tilgate Drive where the proposed boundary is suggested. The current boundary is clearly correct being at the edge of the built-up area.	No change to the existing current boundary.	YES
REP/100	Mr Daniel Taylor	Built Up Area Boundary 8- target Hill and Breezehurst Drive	NO	NO	Built Up Area Boundary Area 8 - Target Hill and Breezehurst Drive. You are suggesting to remove the field which was in the initial plan and then removed under the current plan. This goes against everything. Statement of growth and space per person will reduce below legal limit	Keep as is currently!	YES

Local Plan Map

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/002	Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd. Firstplan	MM17 Crawley Goods Yard and Local Plan Map Change	NC	NC	<p>Firstplan has been instructed by the Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd. to review the Schedule of Proposed Modifications to the Submission Local Plan.</p> <p>Our clients operate Crawley Goods Yard which is an established rail fed aggregates depot, identified as a Safeguarded Railhead on the Local Plan Map Main Modifications version. This site is situated in proximity to the Tinsley Lane housing site. We took part in the local plan examination hearings (ref: REP/002, REP/015 and REP/022). Overall, our clients welcome the proposed modifications although they do have ongoing concerns about the Tinsley Lane site.</p> <p>This change is supported and responds to our client's previous representations. In our opinion Crawley Goods Yard must be shown as a safeguarded rail head in order for the plan to be found sound.</p>		NC

Chapter 4: Character

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/025	Ifield Village Conservation Area Committee	Chapter 4 Character	NC	NC	This is a response from Ifield Village Conservation Area Advisory Committee to the Modifications of the Local Plan. We have looked at section 4 on Character and section 7 on Environment of the modified plan, as these relate to our remit of conserving and enhancing a conservation area. We are in agreement with the changes that have been made and continue with our support of the proposal for a Local Green Space in the southern section of Ifield Brook Meadows (ENV3).		NC
REP/050	Persimmon Homes and Taylor Wimpey Pegasus Planning	MM4, AM035 Policy CH5	NC	NC	<i>Internal Space Standards</i> The modifications to Policy CH5 maintain, within Policy, reference to locally derived minimum floorspace standards for all new dwellings. We do not consider that the modifications to Policy CH5 are sufficient and do not result in a policy that can be considered effective for justified as a basis requiring all new development to adhere to specific local standards. Where it is the case that a local planning authority seeks to impose internal space standards they should only do so by reference in their Local Plan to the Nationally Described Space Standards (PPG:Ref ID: 56-018-20150327) The presumption within national policy and guidance is that Local Plans will not seek to impose local standards. Where there is a need for such local standards, the local planning authority should provide justification for any such requirement. The internal standards identified in Policy CH5 (as modified) are not supported by any evidence to justify their inclusion. This is demonstrated clearly by the reference within the policy, as proposed by MM4, that those standards currently identified in CH5 are time limited as they will be superseded by the adoption of National Policy Standards.		NC

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>The Nationally Described Standards have now been published are to take effect from 1st October 2015. Given that this date is so close the most appropriate approach would be for the policy to simply refer to Nationally Described Standards now rather than include a local standard which will be obsolete almost as soon as the plan is adopted.</p> <p>There remains the question of whether the internal space standards need to be outlined in full within the policy itself. Whilst this may be regarded as repetition of national guidance we can see merit in the standards being set out in the plan to give clarity on precisely what the policy expectation will be.</p> <p><i>Floor to Ceiling Heights</i></p> <p>We also note that within CH5, the reference to a minimum floorspace to ceiling height is inconsistent with the 'technical housing standards- nationally described space standard' which identifies a minimum height of 2.3m as opposed to the 2.5m proposed in Policy CH5. The national standard should apply as set out above.</p> <p><i>External Space Standards</i></p> <p>The deletion of specific reference to "external" space standards within Policy CH5 is supported.</p> <p>We noted during the course of the recent Hearing Sessions that the Inspector provided clear indication to the council that he considered the standards for external space to be excessive and invited the council to reconsider its position on this matter. The removal of the specified external standards from the policy obviously reflects this. However, the additional proposed text to CH5 now refers to SPG4 as an appropriate basis upon which external space standards should be considered.</p>		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>It will be clear to all that the standards set out in SPG4 (2007) are no different to those proposed to be deleted from Policy Ch5. The councils approach is therefore to impose policy standards via an alternative route, by attempting to elevate an SPG and its specific requirements to Development Plan Status by the back door. This ignores the clear indication from the Examination Inspector that such standards are excessive and have the potential to result in the inefficient use of land.</p> <p>This cannot be justified and in the context of a significant unmet need for housing within Crawley, compared with OAHN, to impose such standards must be considered in the context of ensuring that the Borough maximises its capacity to accommodate development in order to minimise, as far as possible, the scale of this unmet need.</p> <p>Space standards should not therefore act as a policy constraint on the delivery of new homes, this is particularly relevant when considered in the context of all the other policy burdens imposed by the 2030 Plan.</p>		
REP/071	Windsor Developments Jmt Planning	MM6 Policy CH9 and new paragraph 4.50	YES	YES	<p>The legal requirements of the 2004 Act and 2012 Regulations appear to have been followed.</p> <p>The proposed modifications appear to meet the relevant soundness criteria and provide clarity regarding possible extensions to Manor Royal on land outside the safeguarding area for a possible second runway</p>		YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/104	Historic England	Policy CH12 Heritage Assets	NC	NC	<p>Thank you for consulting Historic England on the above document by email dated 1 July 2015. We have the following comments to make on matters within our area of concern.</p> <p>Changes to Policy CH12 <i>Heritage Assets</i> – we are not convinced that the proposed change in wording (“protected and enhanced” to “respected and preserved”) helps to clarify the purpose of the policy and we suggest the original proposed wording is retained as this better reflects the wording of primary legislation (Town and Country Planning (listed Buildings and Conservation Areas) Act 1990) and the guidance in the NPPF (e.g. ref, para 7, third bullet and para 156, fifth bullet). A better combination of wording would be “preserved and enhanced” both of which have individually and jointly, specific meanings in the context of heritage assets.</p>	<p>In the third paragraph of Policy CH12, reference should be made to the guidance in NPPF para 133 in relation to exceptional cases of loss or harm to heritage assets – e.g. “If, in exceptional circumstances, a heritage asset is considered to be suitable for loss or replacement when considered against the criteria in NPPF 133, and it has been demonstrated its site is essential to the development’s success...”.</p> <p>Alternatively, appropriate references to the guidance in NPPF regarding harm and loss of heritage assets could be included in paragraph 4.64 of the plan.</p>	NC
REP/104	Historic England	Policy CH15 Heritage Assets	NC	NC	Historic England supports the proposed changes to Policy CH15 Listed Buildings and Structures as these will strengthen the purpose of the policy.		NC

Chapter 5: Economy

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP /071	Windsor Developments Jmtplanning (Mr Jeff Thomas)	MM14-paragraph 5.20	YES	YES	The proposed modification appears to comply with the legal requirements of the 2004 Act and 2012 regulations. The proposed modification meets the soundness criteria and reflects changes to Policy CH9 (MM6) in relation to possible extensions to Manor Royal on land outside safeguarding for a possible second runway.		YES
REP/ 071	Windsor Developments Jmtplanning (Mr Jeff Thomas)	AM066- Paragraph 5.21	YES	YES	The legal requirements of the 2004 Act and 2012 Regulations appear to have been followed. The proposed modifications appear to meet the relevant soundness criteria and provide clarity regarding possible extensions to Manor Royal on land outside the safeguarding area for a possible second runway		YES
REP /079	HCA	Policy EC1	YES	YES	The HCA is aware of Crawley Borough Council's employment land shortfall and would strongly encourage an early review of land currently safeguarded for future airport expansion in light of the recent Airports Commission decision that Heathrow should be the preferred location for airport growth. The safeguarded land immediately adjacent to the existing Manor Royal Employment Area would be an ideal location for additional employment given the proximity to existing business uses, the strategic road network and all other necessary infrastructure. The HCA own significant landholdings in this area, which could address the entire identified employment shortfall. The HCA would be pleased		YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					to work with Crawley Borough Council, and other stakeholders in delivering this land in the short to medium term as required.		
REP/002	Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd. Firstplan	MM17 Text concerning Crawley Goods Yard and Local Plan Map Change:	NC	NC	Firstplan has been instructed by the Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd. to review the Schedule of Proposed Modifications to the Submission Local Plan. Our clients operate Crawley Goods Yard which is an established rail fed aggregates depot, identified as a Safeguarded Railhead on the Local Plan Map Main Modifications version. This site is situated in proximity to the Tinsley Lane housing site. We took part in the local plan examination hearings (ref: REP/002, REP/015 and REP/022). Overall, our clients welcome the proposed modifications although they do have ongoing concerns about the Tinsley Lane site. This change is supported and responds to our client's previous representations. In our opinion Crawley Goods Yard must be shown as a safeguarded rail head in order for the plan to be found sound.		NC
REP/072	Wilky Group Savills Mr Simon Fife	MM13 P.49 Para 5.10	YES	NO	The modified provision for business floorspace is not considered to be sound insofar as it is based on an artificially reduced forecasting time horizon; it is based on a conservative baseline jobs forecast with no allowance for aspirational growth and assessed future economic performance, and does not reflect likely market demand based on past completion rates. Forecasting time-horizon The CBLP has been modified to reflect the revised Economic Growth Assessment Update (EGAU) business floorspace requirement of 57.9 ha over the period 2015-2030. This	Amend the first sentence of para. 5.10 of the Modifications Consultation Draft to read: <i>"The EGA identifies a future need for business floorspace equating to approximately 77 ha, even at the baseline level, to be provided at Crawley, with more recent evidence revising this to 81 ha."</i>	YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>requirement is based on revised Experian economic forecasts contained in the EGAU over a 15-year period 2015-2030. Whilst the principle of updating the forecasts is supported, there is no justification for changing the forecasting period from 20 years to 15 years, which has resulted in an artificial reduction in the job target and related business land requirement. A 20-year horizon should be retained because:</p> <ol style="list-style-type: none"> 1. The EGA for the submission CBLP (June 2014) was based on a 20-year time horizon 2011-2031 – it is inconsistent and misleading for the time horizon to be reduced to 15-years so late in the plan-making process. 2. The NPPF (para 157) advises that local plans should preferably have a 15-year time horizon <u>and take account of longer term requirements</u> 3. The NPPF requires that Councils plan proactively to meet the development needs of business, and positively and proactively encourage sustainable economic growth. Adopting a shorter forecasting period than that contained in the submitted CBLP does not reflect such an approach. <p>Basis of forecast The Council's decision to adopt an employment land requirement based on the 'baseline' forecast of jobs is unsound as it takes no account of a range of other material factors such as market intelligence, past take-up rates and the needs of various business sectors in accordance with Planning Practice Guidance (2a-030- 2014306). The EGA by NLP (2014) classifies the baseline forecast by default as 'policy-off', meaning that it takes no account of the other considerations noted above as Government policy and guidance requires. At the EiP, the Council conceded that it had adopted a constraint-led approach: whilst NLP confirmed that its baseline forecast was not a constrained forecast, the</p>		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>Council acknowledged that it had taken the extent of constraints such as safeguarded land into account in selecting the baseline forecast.</p> <p>This is not what Government guidance requires. Instead, a more positive approach is required whereby the baseline forecast is the starting point of an assessment of the requirement taking account of market needs and potential by sector.</p> <p>The more appropriate and sound approach would be to adopt what NLP calls the 'policy-on' forecast, i.e. the High Growth forecast.</p> <p>Such an approach would also acknowledge the role of Crawley/Gatwick at the heart of the Gatwick Diamond and its ability to act as the driver of the sub-regional economy based around the Gatwick Diamond. To fulfil its sub-regional role, Crawley/Gatwick must therefore have a policy framework that ensures it can accommodate more employment than the local needs of Crawley alone would imply. To an extent this may be aspirational, but as the NPPF notes (para. 154), local plans can be aspirational provided they are realistic.</p> <p>Market demand</p> <p>Past rates of employment floorspace gain suggest that the land requirement should be as high as 137.4 ha (EGA Crawley Emerging Findings Paper - LP063, para. 4.16), nearly twice that under the baseline forecast. Planning Practice Guidance (2a-030-2014306) notes that land take-up rates are one of a number of factors that need to be considered in assessing employment land requirements. The EGA (LP063, para. 4.17) states that the past take-up rates mean that that the baseline forecast is the minimum that is planned for and that higher growth rates are a key policy choice and an inherently pro-growth approach. It is</p>		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>unfortunate that the Council remains tied to its baseline forecast as the basis for planning for future employment land: such an approach is contrary to the approach that underpins Government policy namely that significant weight should be placed on the need to support economic growth through the planning system (NPPF, para. 19).</p> <p>The three factors above point directly to the need to increase the employment land requirement based on the High Growth scenario contained in the EGAU, but based on a 20-year jobs forecast. An estimate of such a forecast is contained in the Statement by Savills to the EiP (REP 072-006) and suggests an employment land requirement of about 81 ha, considerably more than the 'policy-off' starting point in the Modifications of about 58 ha. Further support is provided by the increase in the housing requirement contained in the Modifications by about 2,000 houses, which will lead to a larger number of employees in the Crawley/Gatwick area, leading to the need for more jobs to support that growth.</p> <p>For these reasons, the Modifications employment land requirement of about 58 ha is not sound because:</p> <ol style="list-style-type: none"> 1. It was not positively prepared taking account of all the relevant factors as an assessment of Objectively Assessed Need. 2. It is not justified as the best and most appropriate strategy. 3. It is inconsistent with national planning policy and guidance on planning for economic growth and how to address such in planning policy. 		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/072	Wilky Group Savills Mr Simon Fife	MM13 p.51 Para 5.18	YES	NO	<p>The modified provision for business floorspace is not considered to be sound insofar as it is based on an artificially reduced forecasting time horizon; it is based on a conservative baseline jobs forecast with no allowance for aspirational growth and assessed future economic performance, and does not reflect likely market demand based on past completion rates.</p> <p>Forecasting time-horizon The CBLP has been modified to reflect the revised Economic Growth Assessment Update (EGAU) business floorspace requirement of 57.9 ha over the period 2015-2030. This requirement is based on revised Experian economic forecasts contained in the EGAU over a 15-year period 2015-2030. Whilst the principle of updating the forecasts is supported, there is no justification for changing the forecasting period from 20 years to 15 years, which has resulted in an artificial reduction in the job target and related business land requirement. A 20-year horizon should be retained because:</p> <ol style="list-style-type: none"> 1. The EGA for the submission CBLP (June 2014) was based on a 20-year time horizon 2011-2031 – it is inconsistent and misleading for the time horizon to be reduced to 15-years so late in the plan-making process. 2. The NPPF (para 157) advises that local plans should preferably have a 15-year time horizon and take account of longer term requirements. 3. The NPPF requires that Councils plan proactively to meet the development needs of business, and positively and proactively encourage sustainable economic growth. Adopting a shorter forecasting period than that contained in the submitted CBLP does not reflect such an approach. 	Delete the last sentence of para. 5.18 of the Modifications Consultation Draft and replace with <i>"The EGA update and other evidence combined leads to the conclusion that 81 ha is required for B use class development."</i>	YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>Basis of forecast The Council's decision to adopt an employment land requirement based on the 'baseline' forecast of jobs is unsound as it takes no account of a range of other material factors such as market intelligence, past take-up rates and the needs of various business sectors in accordance with Planning Practice Guidance (2a-030- 2014306 and 2a-031-2014306). The EGA by NLP (2014) classifies the baseline forecast by default as 'policy-off', meaning that it takes no account of the other considerations noted above as Government policy and guidance requires. At the EiP, the Council conceded that it had adopted a constraint-led approach: whilst NLP confirmed that its baseline forecast was not a constrained forecast, the Council acknowledged that it had taken the extent of constraints such as safeguarded land into account in selecting the baseline forecast. This is not what Government guidance requires. Instead, a more positive approach is required whereby the baseline forecast is the starting point of an assessment of the requirement taking account of market needs and potential by sector.</p> <p>The more appropriate and sound approach would be to adopt what NLP calls the 'policy-on' forecast, i.e. the High Growth forecast.</p> <p>Such an approach would also acknowledge the role of Crawley/Gatwick at the heart of the Gatwick Diamond and its ability to act as the driver of the sub-regional economy based around the Gatwick Diamond. To fulfil its sub-regional role, Crawley/Gatwick must therefore have a policy framework that ensures it can accommodate more employment than the local needs of Crawley alone would imply. To an extent this may be aspirational, but as the NPPF notes (para. 154), local plans can be aspirational provided they are realistic.</p>		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>Market demand</p> <p>Past rates of employment floorspace gain suggest that the land requirement should be as high as 137.4 ha (EGA Crawley Emerging Findings Paper - LP063, para. 4.16), nearly twice that under the baseline forecast. Planning Practice Guidance (2a-030-2014306 and 2a-031-2014306) notes that land take-up rates are one of a number of factors that need to be considered in assessing employment land requirements. The EGA (LP063, para. 4.17) states that the past take-up rates mean that the baseline forecast is the minimum that is planned for and that higher growth rates are a key policy choice and an inherently pro-growth approach. It is unfortunate that the Council remains tied to its baseline forecast as the basis for planning for future employment land: such an approach is contrary to the approach that underpins Government policy namely that significant weight should be placed on the need to support economic growth through the planning system (NPPF, para. 19).</p> <p>The three factors above point directly to the need to increase the employment land requirement based on the High Growth scenario contained in the EGAU, but based on a 20-year jobs forecast. An estimate of such a forecast is contained in the Statement by Savills to the EiP (REP 072-006) and suggests an employment land requirement of about 81 ha, considerably more than the 'policy-off' starting point in the Modifications of about 58 ha. Further support is provided by the increase in the housing requirement contained in the Modifications by about 2,000 houses, which will lead to a larger number of employees in the Crawley/Gatwick area, leading to the need for more jobs to support that growth.</p> <p>For these reasons, the Modifications employment land requirement</p>		

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					<p>of about 58 ha is not sound because:</p> <ol style="list-style-type: none"> 1. It was not positively prepared taking account of all the relevant factors as an assessment of Objectively Assessed Need. 2. It is not justified as the best and most appropriate strategy. 3. It is inconsistent with national planning policy and guidance on planning for economic growth and how to address such in planning policy. 		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP /072	Wilky Group Savills Simon Fife	MM13 p.49 Para 5.11	YES	NO	<p>Just prior to the EiP, the Council released an updated Employment Land Trajectory 2015 (ELT, 2015), which reassessed the scale of the supply of available and deliverable land for business uses as 23.16 ha (rounded to 23.2 ha). It is acknowledged that the Council has removed a number of sites from the land supply that were occupied, purchased for owner-occupation, safeguarded or where development was underway. However, clear evidence was presented to the EiP by Savills based on a detailed assessment of the local market by Vail Williams in Crawley that the supply was lower with sites 8 and 11 both unavailable to the market (REP-072- 006) and site 10 having a reduced available area of 3 ha. By removing sites 8 and 11 (4.72 ha) and the balance of site 10 (1.1 ha), the supply falls to 17.34 ha. Based on the average gross landtake of 9 ha / annum (44,500 sqm per year / 5,000 sqm per ha = 9 ha) the current land supply would be exhausted within two years.</p> <p>It is also worth noting the below average quality of the land supply in Crawley. Most of the land is located within the Manor Royal business district, which will offer little choice to the market given that Manor Royal's profile is impacted by its historic purpose as an industrial estate and more recent land use changes: historic light industrial uses, more recent B8 uses, and non-business uses (car showrooms and retail warehousing). The lack of choice is compounded by the small size of the sites the Council claims are available, with the average site size being only 1.8 ha. There are no medium or large sites available which would be suitable for a large corporate occupier. These concerns are borne out by the Council's own research, which acknowledges that the incursion of non B-class activities may 'deter future investors' is 'undermining delivery of new B-class development', and is 'eroding the principle business function of Manor Royal' (LP063, para. 6.11 and LP013, para. 3.31). In the face of the acknowledged qualitative issues, there is no basis for</p>	<p>Amend the first sentence of para 5.11 to read: <i>"...only 17.34 ha of business land can be delivered thorough the existing available land supply"</i>. Consequential changes to para. 5.11 to reflect a higher shortfall in land provision for business uses from 35 ha to 64ha.</p>	YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>identifying a quantum of land supply that does not reflect reality, as to do so would artificially reduce the residual requirement to be identified in the CBLP or its future review. It is evident that Crawley Borough needs more land, more choice to meet market requirements and more land of a higher quality to meet the needs of corporate occupiers. The supply of business land in the CBLP Modifications is too high as it does not reflect market research by Vail Williams, so is not therefore sound because it:</p> <ol style="list-style-type: none"> 1. Is not positively prepared as it does not take account of clear market intelligence in evidence presented at the EiP. 2. Does not represent the best approach to deliver the most appropriate strategy towards delivering business land to meet market requirements. 3. Is not consistent with national planning policy contained in the NPPF (para. 161) and guidance contained in Planning Practice Guidance (2a-030-2014306, 2nd bullet point). 		
REP/072	Wilky Group Savills Simon Fife	MM13 p.49 Para 5.13	YES	NO	<p>Just prior to the EiP, the Council released an updated Employment Land Trajectory 2015 (ELT, 2015), which reassessed the scale of the supply of available and deliverable land for business uses as 23.16 ha (rounded to 23.2 ha). It is acknowledged that the Council has removed a number of sites from the land supply that were occupied, purchased for owner-occupation, safeguarded or where development was underway. However, clear evidence was presented to the EiP by Savills based on a detailed assessment of the local market by Vail Williams in Crawley that the supply was lower with sites 8 and 11 both unavailable to the market (REP-072- 006) and site 10 having a reduced available area of 3 ha. By removing sites 8 and 11 (4.72 ha) and the balance of site 10 (1.1 ha), the supply falls to 17.34 ha. Based on the average gross landtake of 9 ha / annum (44,500 sqm per year / 5,000 sqm per ha = 9 ha) the current land supply would be exhausted within two years. It is</p>	<p>Amend the first sentence of para 5.13 to read: <i>“Sufficient land (17.34 ha) is identified within the borough...”</i>.</p>	YES

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					<p>also worth noting the below average quality of the land supply in Crawley. Most of the land is located within the Manor Royal business district, which will offer little choice to the market given that Manor Royal's profile is impacted by its historic purpose as an industrial estate and more recent land use changes: historic light industrial uses, more recent B8 uses, and non-business uses (car showrooms and retail warehousing). The lack of choice is compounded by the small size of the sites the Council claims are available, with the average site size being only 1.8 ha. There are no medium or large sites available which would be suitable for a large corporate occupier. These concerns are borne out by the Council's own research, which acknowledges that the incursion of non B-class activities may 'deter future investors' is 'undermining delivery of new B-class development', and is 'eroding the principle business function of Manor Royal' (LP063, para. 6.11 and LP013, para. 3.31). In the face of the acknowledged qualitative issues, there is no basis for identifying a quantum of land supply that does not reflect reality, as to do so would artificially reduce the residual requirement to be identified in the CBLP or its future review. It is evident that Crawley Borough needs more land, more choice to meet market requirements and more land of a higher quality to meet the needs of corporate occupiers.</p> <p>The supply of business land in the CBLP Modifications is too high as it does not reflect market research by Vail Williams, so is not therefore sound because it:</p> <ol style="list-style-type: none"> 1. Is not positively prepared as it does not take account of clear market intelligence in evidence presented at the EiP. 2. Does not represent the best approach to deliver the most appropriate strategy towards delivering business land to meet market requirements. 3. Is not consistent with national planning policy contained in the NPPF (para. 161) and guidance contained in Planning 		

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					Practice Guidance (2a-030-2014306, 2nd bullet point).		
REP /072	Wilky Group	MM13 P.50 Policy EC1	YES	NO	<p>Just prior to the EiP, the Council released an updated Employment Land Trajectory 2015 (ELT, 2015), which reassessed the scale of the supply of available and deliverable land for business uses as 23.16 ha (rounded to 23.2 ha). It is acknowledged that the Council has removed a number of sites from the land supply that were occupied, purchased for owner-occupation, safeguarded or where development was underway. However, clear evidence was presented to the EiP by Savills based on a detailed assessment of the local market by Vail Williams in Crawley that the supply was lower with sites 8 and 11 both unavailable to the market (REP-072- 006) and site 10 having a reduced available area of 3 ha. By removing sites 8 and 11 (4.72 ha) and the balance of site 10 (1.1 ha), the supply falls to 17.34 ha. Based on the average gross landtake of 9 ha / annum (44,500 sqm per year / 5,000 sqm per ha = 9 ha) the current land supply would be exhausted within two years.</p> <p>It is also worth noting the below average quality of the land supply in Crawley. Most of the land is located within the Manor Royal business district, which will offer little choice to the market given that Manor Royal's profile is impacted by its historic purpose as an industrial estate and more recent land use changes: historic light industrial uses, more recent B8 uses, and non-business uses (car showrooms and retail warehousing). The lack of choice is compounded by the small size of the sites the Council claims are available, with the average site size being only 1.8 ha. There are no medium</p>	<p>Amend the third paragraph of Policy EC1 to read: <i>"...only 17.34 ha of business land can be delivered thorough the existing available land supply."</i> Consequential changes to Policy EC1 to reflect a higher amount of additional land required for business uses from 35 ha to 64 ha.</p>	YES

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					<p>or large sites available which would be suitable for a large corporate occupier. These concerns are borne out by the Council's own research, which acknowledges that the incursion of non B-class activities may 'deter future investors' is 'undermining delivery of new B-class development', and is 'eroding the principle business function of Manor Royal' (LP063, para. 6.11 and LP013, para. 3.31). In the face of the acknowledged qualitative issues, there is no basis for identifying a quantum of land supply that does not reflect reality, as to do so would artificially reduce the residual requirement to be identified in the CBLP or its future review. It is evident that Crawley Borough needs more land, more choice to meet market requirements and more land of a higher quality to meet the needs of corporate occupiers.</p> <p>The supply of business land in the CBLP Modifications is too high as it does not reflect market research by Vail Williams, so is not therefore sound because it:</p> <ol style="list-style-type: none"> 1. Is not positively prepared as it does not take account of clear market intelligence in evidence presented at the EIP. 2. Does not represent the best approach to deliver the most appropriate strategy towards delivering business land to meet market requirements. 3. Is not consistent with national planning policy contained in the NPPF (para. 161) and guidance contained in Planning Practice Guidance (2a-030-2014306, 2nd bullet point) 		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP /072	Wilky Group Savills Simon Fife	MM13 Page 51 Para. 5.19	YES	NO	<p>Just prior to the EiP, the Council released an updated Employment Land Trajectory 2015 (ELT, 2015), which reassessed the scale of the supply of available and deliverable land for business uses as 23.16 ha (rounded to 23.2 ha). It is acknowledged that the Council has removed a number of sites from the land supply that were occupied, purchased for owner-occupation, safeguarded or where development was underway. However, clear evidence was presented to the EiP by Savills based on a detailed assessment of the local market by Vail Williams in Crawley that the supply was lower with sites 8 and 11 both unavailable to the market (REP-072- 006) and site 10 having a reduced available area of 3 ha. By removing sites 8 and 11 (4.72 ha) and the balance of site 10 (1.1 ha), the supply falls to 17.34 ha. Based on the average gross landtake of 9 ha / annum (44,500 sqm per year / 5,000 sqm per ha = 9 ha) the current land supply would be exhausted within two years. It is also worth noting the below average quality of the land supply in Crawley. Most of the land is located within the Manor Royal business district, which will offer little choice to the market given that Manor Royal's profile is impacted by its historic purpose as an industrial estate and more recent land use changes: historic light industrial uses, more recent B8 uses, and non-business uses (car showrooms and retail warehousing). The lack of choice is compounded by the small size of the sites the Council claims are available, with the average site size being only 1.8 ha. There are no medium or large sites available which would be suitable for a large corporate occupier. These concerns are borne out by the Council's own research, which acknowledges that the incursion of non B-class activities may 'deter future investors' is 'undermining delivery of new B-class development', and is 'eroding the principle business function of Manor Royal' (LP063, para. 6.11 and LP013, para. 3.31). In the face of the acknowledged qualitative issues, there is no basis for identifying a quantum of land supply that does not reflect</p>	<p>Amend the third sentence of para. 5.19 to read:</p> <p><i>"There is an available land supply of 17.34 ha (as set out in the Crawley Employment Land Trajectory, February 2015, as amended) comprising existing development commitments..."</i></p> <p>Amend the Crawley Employment Land Trajectory, February 2015 to reflect the evidence by Savills/Vail Williams at the EiP (REP-072-006).</p>	YES

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					<p>reality, as to do so would artificially reduce the residual requirement to be identified in the CBLP or its future review. It is evident that Crawley Borough needs more land, more choice to meet market requirements and more land of a higher quality to meet the needs of corporate occupiers.</p> <p>The supply of business land in the CBLP Modifications is too high as it does not reflect market research by Vail Williams, so is not therefore sound because it:</p> <ol style="list-style-type: none"> 1. Is not positively prepared as it does not take account of clear market intelligence in evidence presented at the EIP. 2. Does not represent the best approach to deliver the most appropriate strategy towards delivering business land to meet market requirements. 3. Is not consistent with national planning policy contained in the NPPF (para. 161) and guidance contained in Planning Practice Guidance (2a-030-2014306, 2nd bullet point). 		
REP/072	Wilky Group Savills Simon Fife	MM13 Page 51 Para. 5.20	YES	NO	<p>The modified provision for business floorspace is not considered to be sound insofar as it is based on an artificially reduced forecasting time horizon; it is based on a conservative baseline jobs forecast with no allowance for aspirational growth and assessed future economic performance, and does not reflect likely market demand based on past completion rates.</p> <p>Forecasting time-horizon The CBLP has been modified to reflect the revised Economic Growth Assessment Update (EGAU) business floorspace requirement of 57.9 ha over the period 2015-2030. This requirement is based on revised Experian economic forecasts contained in the EGAU over a 15-year period 2015-</p>	<p>Amend first sentence of para 5.20 to read of the Modifications Consultation Draft to read:</p> <p><i>"...just to meet the demand of 81 ha of land for business class uses".</i></p> <p>Consequential change to the remaining outstanding need for business land from 35 ha to 64 ha.</p>	YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>2030. Whilst the principle of updating the forecasts is supported, there is no justification for changing the forecasting period from 20 years to 15 years, which has resulted in an artificial reduction in the job target and related business land requirement. A 20-year horizon should be retained because:</p> <ol style="list-style-type: none"> 1. The EGA for the submission CBLP (June 2014) was based on a 20-year time horizon 2011-2031 – it is inconsistent and misleading for the time horizon to be reduced to 15-years so late in the plan-making process. 2. The NPPF (para 157) advises that local plans should preferably have a 15-year time horizon and take account of longer term requirements. 3. The NPPF requires that Councils plan proactively to meet the development needs of business, and positively and proactively encourage sustainable economic growth. Adopting a shorter forecasting period than that contained in the submitted CBLP does not reflect such an approach. <p>Basis of forecast</p> <p>The Council's decision to adopt an employment land requirement based on the 'baseline' forecast of jobs is unsound as it takes no account of a range of other material factors such as market intelligence, past take-up rates and the needs of various business sectors in accordance with Planning Practice Guidance (2a-030- 2014306 and 2a-031-2014306). The EGA by NLP (2014) classifies the baseline forecast by default as 'policy-off', meaning that it takes no account of the other considerations noted above as Government policy and guidance requires. At the EiP, the Council conceded that it had adopted a constraint-led approach: whilst NLP confirmed that its baseline forecast was not a constrained forecast, the Council acknowledged that it had taken the extent of constraints such as safeguarded land into account in selecting the baseline forecast.</p>		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>This is not what Government guidance requires. Instead, a more positive approach is required whereby the baseline forecast is the starting point of an assessment of the requirement taking account of market needs and potential by sector.</p> <p>The more appropriate and sound approach would be to adopt what NLP calls the 'policy-on' forecast, i.e. the High Growth forecast.</p> <p>Such an approach would also acknowledge the role of Crawley/Gatwick at the heart of the Gatwick Diamond and its ability to act as the driver of the sub-regional economy based around the Gatwick Diamond. To fulfil its sub-regional role, Crawley/Gatwick must therefore have a policy framework that ensures it can accommodate more employment than the local needs of Crawley alone would imply. To an extent this may be aspirational, but as the NPPF notes (para. 154), local plans can be aspirational provided they are realistic.</p> <p>Market demand</p> <p>Past rates of employment floorspace gain suggest that the land requirement should be as high as 137.4 ha (EGA Crawley Emerging Findings Paper - LP063, para. 4.16), nearly twice that under the baseline forecast. Planning Practice Guidance (2a-030-2014306 and 2a-031-2014306) notes that land take-up rates are one of a number of factors that need to be considered in assessing employment land requirements. The EGA (LP063, para. 4.17) states that the past take-up rates mean that that the baseline forecast is the minimum that is planned for and that higher growth rates are a key policy choice and an inherently pro-growth approach. It is unfortunate that the Council remains tied to its baseline forecast as the basis for planning for future employment land: such an approach is contrary to the approach that underpins Government policy namely that significant weight should be</p>		

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>placed on the need to support economic growth through the planning system (NPPF, para. 19).</p> <p>The three factors above point directly to the need to increase the employment land requirement based on the High Growth scenario contained in the EGAU, but based on a 20-year jobs forecast. An estimate of such a forecast is contained in the Statement by Savills to the EiP (REP 072-006) and suggests an employment land requirement of about 81 ha, considerably more than the 'policy-off' starting point in the Modifications of about 58 ha. Further support is provided by the increase in the housing requirement contained in the Modifications by about 2,000 houses, which will lead to a larger number of employees in the Crawley/Gatwick area, leading to the need for more jobs to support that growth.</p> <p>For these reasons, the Modifications employment land requirement of about 58 ha is not sound because:</p> <ol style="list-style-type: none"> 1. It was not positively prepared taking account of all the relevant factors as an assessment of Objectively Assessed Need. 2. It is not justified as the best and most appropriate strategy. 3. It is inconsistent with national planning policy and guidance on planning for economic growth and how to address such in planning policy. 		
REP /072	Wilky Group Savills Simon Fife	AM066 Page 52 Para. 5.21	YES	YES	The changes to paragraph 5.21 clarify the key characteristics of the Area of Search (AOS) for a Strategic Employment Location(s) south and east of Gatwick Airport, and provides a more realistic assessment that the AOS is unlikely to be suitable for housing development, rather than it 'cannot accommodate' such development. Airport noise levels are such that residential development within the AOS is unlikely	No change to para. 5.21.	YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>to be acceptable, except perhaps for some minor development furthest from the flight path noise contours.</p> <p>The proximity of the AOS to Gatwick Airport, Manor Royal and existing strategic transport links represents a major locational advantage that should be realised in line with the objectives of the Coast to Capital LEP and the Gatwick Diamond initiative.</p> <p>The Modifications to para. 5.21 are considered to be sound.</p>		
REP/002	<p>Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd.</p> <p>Firstplan</p>	MM18 Policy EC4	NC	NC	<p>Firstplan has been instructed by the Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd. to review the Schedule of Proposed Modifications to the Submission Local Plan. Our clients operate Crawley Goods Yard which is an established rail fed aggregates depot, identified as a Safeguarded Railhead on the Local Plan Map Main Modifications version. This site is situated in proximity to the Tinsley Lane housing site. We took part in the local plan examination hearings (ref: REP/002, REP/015 and REP/022). Overall, our clients welcome the proposed modifications although they do have ongoing concerns about the Tinsley Lane site.</p> <p>This change is supported and responds to our client's previous representations. The addition of the first paragraph setting out that 'where residential development is proposed within or adjacent to Main Employment Areas, the principal concern will be to ensure that the economic function of the area is not constrained' must be included in order for the plan to be considered sound.</p>		NC

Chapter 6: Housing

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/076	Mrs Jennifer Grace Withall	Housing and Housing for Older People	NC	NC	<p>Dear Madam/Sirs</p> <p>This is all to complicated for us oldies. All we are asking for is suitable homes for when we become old like the one we have found after a year of searching.</p> <p>Please see the attached article for further information.</p>		NC
REP/079	WSSC	MM26 Housing for Older People Para 6.28-6.31	NC	NC	<p>West Sussex County Council welcomes the recognition given in paragraphs 6.28–6.31 to the issue of housing for older people, and specifically to the need for infrastructure including purpose-built Housing and Care Homes to accommodate growing numbers of older people with care needs.</p>		NC
REP/079	WSSC	Policy H1: Housing Provision	NC	NC	<p>It is noted that after a further small increase in housing numbers for the overall Plan the Local Plan is now expected to deliver at least 5,100 homes over the next 15 years with an acknowledged unmet need of around 5,000 homes, based on the revised objectively assessed housing need of 10,125 homes over the Plan period. The County Council will support the Borough Council as appropriate in exploring potential opportunities for accommodating unmet housing needs identified in the Crawley 2030 Local Plan.</p>		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/079	HCA	MM27 Policy H1	YES	YES	The Homes & Communities Agency (HCA) support the increased housing supply figures and the commitment by Crawley Borough Council to work closely with neighbouring authorities to address unmet housing need and subsequent infrastructural and environmental requirements. The HCA own significant land holdings to the west of Ifield which are well placed to contribute to the Northern West Sussex Market Area Authorities housing needs, as a viable and sustainable urban extension to Crawley. The HCA will look to work proactively with Crawley Borough Council, Horsham District Council and the Consortium (Rydon Homes, Wates Developments and Welbeck Strategic Land LLP) regarding the feasibility and timing of the progression of these landholdings, with the aim of delivering a high quality and sustainable, residential-led development with significant community, environmental and wider infrastructure benefits. A western expansion to Crawley Borough can be brought forward in the short to medium term alongside the Councils' and local community's aspirations. The HCA note that in the recent additional Horsham District Council EIP Hearing Session, the western expansion of Crawley was discussed as an opportunity to address unmet housing need, potentially in the short to medium term.		YES
REP/073	Waverley Borough Council	MM27 Policy H1: Housing Provision	NC	NC	Thank you for your notification of the above modifications to your Local Plan. Further to our representations on Policy H1 of the Crawley submission Local Plan on 13th October 2014 we acknowledge the additional wording proposed under Final Main Modification MM27. This clarifies that Crawley Borough Council will work with its neighbouring authorities in particular those that form the Northern West Sussex Housing Market Area (HMA) to explore opportunities to meet its unmet housing need. Whilst we welcome the clarity that the new text in Policy H1 brings, we recognise that this does not preclude Crawley considering HMAs other than the Northern West Sussex HMA to meet its unmet need. We would therefore like to repeat the view		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					set out in my email of 13th October 2014 that Waverley is a predominantly rural Borough that has a number of environmental designations that constrain development, including the Green Belt, an Area of Outstanding Natural Beauty and Special Protection Areas. As such, it is very unlikely that Waverley would be able to accommodate unmet need for another HMA.		
REP/074	Rydon Homes, Wates Developments and Welbeck Strategic Land LLP (the Consortium) Montagu Evans	MM27 Policy H1: Housing Provision	NC	NC	<p>These representations are made on behalf of Rydon Homes, Wates Developments and Welbeck Strategic Land LLP (the Consortium) who are promoters of Land West of Ifield, a proposed urban extension to the western edge of Crawley. The masterplan shows capacity for 2,500 dwellings together with community facilities and public open space. Officers and members of Crawley Borough Council (CBC) have been aware of the promotion of the site (the majority of which lies within Horsham District) since 2008 and have received copies of the masterplan and the significant evidence base which has informed the masterplan work. These representations are made in reference to the Main Modifications to Policy H1. It is noted that the amended wording makes reference to Crawley's commitment to work with other authorities in the North West Housing Market Area in order to seek to meet Crawley's identified unmet housing requirement, including the continued assessment of potential extensions to Crawley.</p> <p>As the Consortium has made aware in numerous representations to Crawley's Local Plan, and in hearing statements to the Examination in Public Inspectors for both Horsham and Crawley's plans an urban extension to the west of Crawley is only location in which the town can be extended. The north, east and southern boundaries are constrained precluding deliverable development. An urban extension to Crawley, in order to meet housing need generated by Crawley, is evidently the most sustainable location for meeting this identified need.</p> <p>In the light of the Horsham Inspector's findings of July 2015, Horsham is required to increase its housing figures in order to further assist in meeting the housing need generated by Crawley.</p>	<p>To this end, the Consortium recommends that Policy H1 requires:</p> <p>i. An early review within three years, in order that sufficient sites are identified to meet Crawley's objectively assessed housing need. This review should be within 3 years of the adoption of the plan so that a review may take place simultaneously with the review of Horsham District Planning Framework.</p> <p>ii. A strengthening of the commitment to identifying and agreeing housing sites within this Local Plan Review to meet this shortfall.</p> <p>The Consortium welcomes the Council's commitment to work beyond its boundaries in order to ensure that its housing shortfall is met. Given that Horsham is relatively unconstrained and geographically best placed to assist Crawley in meeting its housing shortfall, Policy H1 should include a commitment for an early review at the same juncture at Horsham District. This policy requirement would also be reflective of the Council's objective to review the</p>	NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>This will require consideration by Horsham District Council to identify further sites in order to meet this need. In addition the Inspector requires an early review within 3 years of the plan in order to reflect any decision regarding the expansion of Gatwick Airport, but also to ensure that the housing needs (generated largely by Crawley) of the North Sussex Housing Market are being properly met.</p> <p>It is therefore likely that West of Ifield will be required to meet Crawley's growing housing need. To this end, the Consortium wishes to take this opportunity to express its commitment to working with both Horsham and Crawley Councils and the Homes and Communities Agency in order to deliver an extension to Crawley at West of Ifield in accordance with the revised wording of Policy H1. However further commitment to meeting unmet housing need is required.</p>	Local Plan pending a decision on airport expansion.	
REP/101	Sussex Wildlife Trust	MM27 Policy H1: Housing Provision	NC	NC	<p>The Sussex Wildlife Trust questions the wording of the additional paragraph in Policy H1. Given the huge constraints already identified by neighbouring authorities in their Local Plan processes, it is uncertain whether the county's natural capital can absorb this level of development. There must be some acknowledgement of the environmental limits of the County as a whole.</p> <p>Development sites should subject to a thorough assessment of their suitability, including of their ecological value as well as their wider contribution in delivering and sustaining ecosystem services.</p> <p>The Borough Council should be working with neighbouring authorities to assess the ability of the county's natural capital to absorb more development. We object to the environment being characterised as a constraint to sustainable development in the wording of this paragraph. This is not consistent with paragraphs 7 – 9 of the National Planning Policy Framework (NPPF).</p>		NC

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REP/039	Mid Sussex District Council	MM27 Policy H1: Housing Provision	NC	NC	<p>Thank you for the opportunity to comment on the proposed modifications to Crawley 2030: the Crawley Borough Local Plan. Main modification 27 which is proposed to be made to Policy H1 states:</p> <p><i>There will be a remaining unmet housing need, of approximately 5,000 dwellings, arising from Crawley over the Plan period. The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.</i></p> <p>As one of the local authorities which would be directly affected by this modification, in the spirit of our ongoing joint working and cooperation, we are happy to support it.</p>		NC
REP/047	Mayfield Market Towns Quod	MM27 Policy H1: Housing Provision	NC	NC	<p>We submit these representations on behalf of Mayfield Market Towns Ltd (MMT), in relation to the above consultation. These representations follow those submitted by MMT to the Proposed Submission Crawley Local Plan in October 2014 and during the Examination in Public that took place in March 2015.</p> <p>As outlined in our earlier representations to the Local Plan, MMT is promoting a New Market Town known as 'Mayfields' in the area between Sayers Common and Henfield, which straddles Horsham and Mid Sussex District. Given the acknowledged shortfall in housing delivery in Crawley (identified by Main Modification 27 to be 5,000 dwellings over the plan period to 2030), it is evident that the Mayfields New Market Town can assist Crawley Borough Council (CBC) and other neighbouring authorities where there is an acknowledged unmet need. Indeed, CBC is only able to meet approximately 50% of its objectively assessed housing need (as recognised by Main Modification 27).</p>	<p>However, we do not believe that this additional text goes far enough. Without a clear timetable to demonstrate how CBC's unmet needs are to be addressed it is difficult to see how the Local Plan can be found sound. Equally, it is clear that only a new strategic initiative such as a new market town has the potential to address the scale of unmet needs. It is suggested, therefore, that the following amendment is made at Main Modification 27:</p> <p><i>"The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in</i></p>	NC

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					<p>Given the scale of unmet need within Crawley Borough and the wider sub-region it is imperative that CBC is proactive and actively engages with neighbouring authorities in seeking to address the unmet need. The unmet need in Crawley and the wider sub-region is well documented. Despite this, no authority is doing all it can to assist. For example, most recently, Mid Sussex District Council published their Pre-submission Draft District Plan (June 2015), which was subject to consultation. This identifies a housing figure that seeks <u>to only meet the District's needs</u>. Consequently, the approach of Mid Sussex District Council, like other authorities in the sub-region, is not seeking to meet any of the unmet need of neighbouring authorities, including CBC.</p> <p>This collective failure to apply meaningfully the duty to co-operate has serious economic and social consequences and should not be condoned.</p> <p>In this regard, we welcome the additional text proposed under Main Modification 27 that identifies that CBC will work closely with its neighbouring authorities in exploring opportunities to meet the need.</p>	<p><i>sustainable locations. This will include continued assessment of potential urban extensions to Crawley and <u>the potential for a New Market Town as a strategic development to meet unmet housing needs. The work should proactively seek to meet documented unmet needs where this can be achieved consistently with the NPPF and to define delivery mechanisms to enable development to be undertaken in good time to meet those needs.</u></i></p> <p>We should then expect the Council to set a clear timetable for the necessary joint working.</p> <p>We trust that these representations will be given due consideration by the Council.</p>	
REP/108	Mr Stephen Coppen	MM027 to Policy H1: Housing Provision	No	No	<p>The modification is misleading. CBC cannot CONTINUE something it has never begun. The only possible location for an urban extension is West of Ifield, but a formal resolution was passed in 2005 that ' Development of Ifield golf course (West of Ifield) is unacceptable to Crawley'. No credible reasons were given why, and this resolution is still in force despite a shortfall of 5000+ homes in the plan. CBC has only ever sought to obstruct and prevent any new development West of Ifield. They stated recently that their actions were due to 'The confusion of a Crawley resident, Mr Richard Symonds! (see; http://www.crawley.gov.uk/pw/web/PUB242728). The development framework is based,then, on 'confusion', and is, therefore not sound. Even now, MM027 still does not Identify West of Ifield even though it is the ONLY possible location for a new urban extension.</p>	<p>Modification MM027 to policy H1 should be re-worded to ;</p> <p>1) Revoke and recind the council's resolution that development of Ifield golf course is unacceptable to Crawley. 2) Confirm that CBC will, without any further delay, fulfill it's legal 'Duty to cooperate' and now liase earnestly and pro-actively with Horsham District Council to allocate West of Ifield which is suitable,available,sustainable, and deliverable within the plan period to provide a large part of desperately needed shortfall of homes in Crawley.</p>	NO

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					CBC has not fulfilled it's 'Duty to cooperate'.	MM027 to policy H1 should undertake to revoke CBC's formal resolution that 'Development of Ifield golf course is unacceptable to Crawley'. Confirm that CBC will now liase earnestly and pro-actively with Horsham district council to allocate West of Ifield and thereby fulfill it's 'Duty to cooperate'.	
REP/109	Brighton & Hove City Council	MM27 Policy H1: Housing Provision	NC	NC	<p>"Brighton & Hove City Council welcomes the opportunity to comment on the proposed modifications to the Crawley Borough Local Plan.</p> <p>It is noted that the revised Objectively Assessed Housing Need for the borough is now 10,125 dwellings over the plan period, equating to 675 dwellings per annum. The unmet need has risen from 3,000 to 5,000 units as the modified plan provides for no further housing provision.</p> <p>The City Council recognises the constraints faced by Crawley in planning to meet its full objectively assessed housing needs, in particular the tightly drawn administrative boundary around the borough. Given that the authorities that comprise the Sussex Coast SHMA as a whole are not able to provide for their own objectively assessed demand, and given the overlaps and interrelationships with the Northern West Sussex HMA and Brighton & Hove (and Coastal West Sussex) it is important that all reasonable means of maximising housing provision across the wider area are pursued.</p> <p>It is therefore welcomed that the proposed modifications (MM27) indicate that Crawley Borough Council will continue to work closely with other authorities, particularly those which form the Northern West Sussex Housing Market Area, and explore opportunities and resolve infrastructure and environmental constraints in order to meet the unmet need in sustainable locations, including the continued assessment of potential urban extensions to Crawley."</p>		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/033	Horsham District Council	MM24 MM27 Policy H1: Housing Provision	NC	NC	<p>Thank you for inviting Horsham District Council (HDC) to comment on the Modifications Consultation Draft of the Crawley 2030 Local Plan. We have now had the opportunity to study the consultation documents in detail and offer the following comments and observations.</p> <p>Overall, HDC supports the modifications to the Crawley 2030 Local Plan (June 2015) subject to ongoing joint working as per the recently updated Position Statement (of March 2015), which addresses issues within the Northern West Sussex Housing Market Area between the three Northern West Sussex Authorities (Crawley Borough Council (CBC), Horsham District Council (HDC) and Mid Sussex District Council (MSDC)).</p> <p>HDC is aware of the scale of CBC's unmet housing need, and appreciates the constraints CBC faces with regards to housing land availability. HDC supports the efforts of CBC to continuously identify all available sites for housing, and is pleased to note that the total supply of land for housing within the Borough has been increased from 3,800 dwellings in the Preferred Strategy to 4,895 in the draft submission, and most recently to 5,425 dwellings in Main Modifications MM 24.</p> <p>HDC notes that Policy H1 of the Local Plan (MM 27) has been amended to reflect the most recent 2012-based CLG household projections by providing for the development of a minimum of 5,100 new dwellings to 2030; this leaves an unmet housing need in Crawley of approximately 5,000 units over the Plan period (334 per annum) which has increased from the 3,135 unit shortfall (209 per annum) in the Preferred Strategy. HDC welcomes the phrase 'a minimum' in Policy H1 when referring to the development of dwellings in the borough during the plan period, as this does not put a ceiling the amount of dwellings provided for in the Local Plan, but offers flexibility throughout the plan period to explore opportunities for further housing development in order to contribute to meeting the overall shortfall in the Northern West Sussex Housing Market Area.</p> <p>Through the duty to cooperate and a desire to ensure a sufficient supply of housing is delivered within the Northern West Sussex</p>		NC

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					<p>HMA, HDC has allocated provision for additional housing units above and beyond the District's Objectively Assessed Need with particular reference to Crawley. As a result of the recent Examination hearing into the Horsham District Planning Framework (HDPF), the Inspector has directed in a Note to the Council that HDC should increase its housing target from 750 to 800 homes per year in order to cater for an increase in CBC's housing requirement (and subsequent increase in unmet need). This increase in HDC's housing target will help to provide for some unmet need in Crawley over the next 15 years (albeit not all), and during this time HDC will continue to assess with CBC and MSDC the most appropriate opportunities and potential solutions to the meeting the overall housing needs across the wider housing market area.</p> <p>HDC has noted and support CBC's approach towards other neighbouring authorities to continue to seek new locations for housing development outside CBC's boundaries via the Northern West Sussex Position Statement with HDC and MSDC and the Statement of Common Ground with Reigate and Banstead BC.</p> <p>It should be noted that at this point in time HDC is the only authority area where it is clear that some of the needs of Crawley will be met. Given that there still remains a shortfall within the housing market area, HDC would support (in particular as indicated in MM27) Crawley through ongoing Duty to Cooperate discussions, to seek to secure help from other authorities to meet their unmet needs. HDC have already worked with CBC to deliver 2,500 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.</p>		

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REP/019	Mr Charles Crane	Policy H2: key Housing Sites p.82 para.6.47 Breezehurst Drive and Henty Close		NO	<p>The proposed total for the number of new homes on Breezehurst Drive Playing Fields and Henty Close is less in this modified Plan than previously proposed. However, it is still unacceptable for all the reasons I have previously stated including:</p> <p>(i) it will result in the loss of park and recreation space and;</p> <p>(ii) will leave Bewbush with less park and recreation space than the council's own minimum standard.</p> <p>If this proposal goes ahead, it will prove the council's minimum space standard for park and recreation space to be meaningless words. These modified proposals seem to include a number of conditions which must be met before the homes can be built. However it is possible that the modified plan will also prove to be meaningless words.</p> <p>It is unlikely that I would support the building of any more homes in Bewbush. The council claim there is a surplus of natural and amenity green space. I am not convinced that this claim is accurate, but let us assume that it is. Would it not make more sense to build new homes on areas where there is a surplus, rather than reducing the amount of park and recreation ground to below the minimum standard?</p> <p>Also, this proposal does not comply with paragraph 74 of the National Planning Policy Framework.</p>	Remove all proposals to build new homes on Breezehurst Drive Playing Fields and Henty Close.	YES
REP/057	Sport England	Policy H2: Key Housing Sites	NC	NC	<p>Sport England is pleased to note the proposed changes to Crawley Local Plan following its Examination in public. Sport England wishes to thank Crawley Officers for their positive dialogue and cooperation throughout the Examination period.</p> <p>In light of the proposed modifications, Sport England considers the Local Plan to provide a much stronger policy offering protection to playing fields along with potential to secure improvements to existing sports provision.</p> <p>The attached table sets out some minor changes which Sport England consider will add to the robustness of the policies.</p> <p>If you wish to discuss any of the proposed changes, please contact me.</p>		NC

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REP/057	Sport England	MM28 Policy H2: Key Housing Sites p.74	NC	NC	<p>For clarity Sport England considers it necessary to specifically reference football pitches.</p> <p>Public access can infer use of pitches without any prior arrangement or hire. Therefore Sport England recommends 'community use' which is a recognised industry term referring to the formal hire of pitch provision.</p> <p>Sport England considers it important for any development brief to be shaped by consultation.</p>	<p>Housing and Open Space Sites Tinsley Lane, Three Bridges (deliverable) 138 120 dwellings, mixed use recreation/residential. Development of this site must include:</p> <ul style="list-style-type: none"> i. the replacement of Oakwood Football Club; ii. senior football pitch and facilities; iii. a floodlit junior 3G football pitch; iv. public access community use arrangements for the sports pitch facilities; v. enhancement and management for public access of Summersvere Woods; vi. on-site publicly accessible play space and amenity greenspace. vii. Consideration should also be given to the provision of allotments. <p>Development must also be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site. Full details of the requirements relating to this site will be set out in a Development Brief prepared in consultation with stakeholders.</p>	NC

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REP/057	Sport England	MM28 Policy H2: Key Housing Sites p.74	NC	NC	For clarity Sport England considers it necessary to specify 'pitch provision' as opposed to sports space. Sport England considers it important for any development brief to be shaped by consultation.	Breezehurst Drive Playing Fields, Bewbush (developable) 65 dwellings, mixed use recreation/residential. Development of this site must include: i. the retention of good quality outdoor sports-space pitch provision to the south of the pavilion; provision of enhanced pitch drainage off-site; and ii. new or retained provision of changing facilities to be directed towards Skelmersdale Walk Playing Fields or other suitably located provision to meet future fluctuations in demand for pitch sports. iii. Consideration should also be given to the provision of allotments off-site should demand from residents exist. These requirements will be set out in full in a Development Brief prepared in consultation with stakeholders.	NC
REP/057	Sport England	MM28 Policy H2:Key Housing Sites p.75 para 6.46-6.47	NC	NC	Sport England considers it important for any development brief to be shaped by consultation and is keen to engage in the preparation of each development brief. Sport England seeks to ensure the off-site pitches improvements are undertaken to an appropriate specification and in line with identified priorities. A prioritised action plan of pitch improvements will need to be developed by the Council as part of the preparation of the development brief.	A development brief will be prepared for each of these sites in consultation with stakeholders including Sport England to ensure their development adheres to the requirements of the Open Space, Sport and Recreation Study and Playing Pitch Study; critical elements of these are set out in the Policy. For Tinsley Lane this will involve consideration into the needs of the existing football club; whilst for Breezehurst Drive sports pitch improvements will be required both on-site and off-site. The	NC

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						development brief will set out the location and specification for all off-site pitch improvements. †The balance between housing and on-site open space will be determined through the design and layout of a detailed scheme.	
REP/012	BUPA Mr Andy Stallan	Policy H2: Key Housing Sites Oakhurst Grange	NC	NC	<p>We support in principle the fact that the policy modification would enable the site to come forward for either market housing or housing for older people, as recommended by the Inspector following our representations.</p> <p>However, rather than including Oakhurst Grange under a separate heading entitled 'Housing for Older People', the site should be included in the list of Key Housing Sites, with the same text but as amended below, enabling either option to be pursued.</p> <p>Alternatively it should have a mixed title like 'Housing for Older People or Market Housing' or be entitled Oakhurst Grange. This policy should, therefore, be further modified to address this point.</p> <p>In terms of the content of the policy, the proposed description of the C2 option for development at the site of 'up to 120 residential rooms' is not in keeping with the likely development option for this site. It is more likely to be for 'an extra care scheme comprising a care home and up to 75 extra care housing units for older people'. We therefore request that this element of the policy either be changed as referred to above, or changed to 'extra care scheme comprising care home and extra care housing units for older</p>		NC

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					<p>people.' The policy should, therefore, be further modified to address this point.</p> <p>We object to the proposed figure of 55 market dwellings included in Policy H2. This is inflexible and does not allow for a scheme of a higher density to be considered acceptable on this very sustainable urban site. Whilst there are some constraints to the site, we are confident that the site could satisfactorily accommodate between 55-65 dwellings, satisfying all relevant development management criteria. We recommend that the policy should be amended to delete '55 dwellings' and insert 'between 55 and 65 dwellings' or at the very least 'approximately 60 dwellings'.</p>		
REP/075	WSCC	MM28 Policy H2: Key Housing Sites Oakhurst Grange	NC	NC	The County Council also welcomes the proposed allocation of the Oakhurst Grange site in Policy H2 for development that specifically meets the needs of older people.		NC
REP/075	WSCC	MM28 Policy H2: Key Housing Sites Tinsley Lane	NC	NC	In its response to the Crawley 2030 Submission Local Plan in October 2014 the County Council stated that, as the Minerals Planning Authority, it did not object to the proposed recreation/residential allocation at Tinsley Lane, Three Bridges "...if the adjoining minerals safeguarding is appropriately considered through the allocation". The additional wording now proposed in Policy H2 , stating that the development must be designed to "...minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site", is therefore welcomed. However the County Council maintains its position of reserving the right consider the		NC

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					proposal in detail at planning application stage given that evidence of any such impacts is likely to be forthcoming at that time.		
REP/110	Mr John Browning	Policy H2: key Housing Sites Tinsley Lane	NC	NC	<p>I have the following comments regarding the Latest Local Plan Update in respect of Development of the HCA "Tinsley Lane" site for housing etc.</p> <p>While recognising the number of deliverable dwellings proposed to be built on the Tinsley Lane recreational area (HCA site) has been reduced from 138 to 120, I am disappointed that this still represents a probable mix of properties not in character with the surrounding residential area due to the high density of development necessary to achieve this on the proposed site (2.66 hectares at a density of 51 as documented in the Site Reference 45 -Tinsley Lane document in Appendix C- Local Plan Key Housing Allocations Policy H2).</p> <p>As the 2.66 hectare and 51 density figure equate to 136 dwellings rather than the 120 stated in the Plan it would be helpful if Crawley Borough Council provided an explanation of any reduction in land available and associated increased density of proposed housing as well as any re-calculation of land required for relocation of & provision of adequate facilities for Oakwood Football Club and other (public access) recreational facilities, including consideration for the provision of allotments.</p> <p>I am encouraged that it is recognised in Section 6.53 that the proximity of Gatwick Goods Yard and the issues this represents has been included as a Main Modification (eg "Tinsley Lane is located in close proximity to Crawley Goods Yard (Goods Yard) which is a safeguarded minerals site. Development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on its important minerals function").</p> <p>Crawley Borough Council are aware there are already MAJOR ISSUES due to the close proximity of residential dwellings to this</p>		NC

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					<p>Goods Yard as over a number of years night-time deliveries requiring train unloading from mid-night through the small hours of the night (and occasionally until dawn) have been a long standing source of noise disturbances to a number of residents. Some of whom live further away from this noise source than dwellings in the proposed development area.</p> <p>If CBC and West Sussex County Council believe this Goods Yard site with its safeguarded status is an essential community asset then the Local Plan should:-</p> <p>EITHER Have all proposed residential development removed from the HCA site. OR Development must be required to incorporate adequate noise mitigation/reduction installation(s) sited as close to the noise source as possible (eg in the Goods Yard) and not as outlined in the HCA proposal presented at the public hearing where noise mitigation was only proposed for incorporation into the building facades at the north and east facing aspects of the buildings at the extremities of the development. The requirement for noise suppression to be located AS CLOSE AS POSSIBLE to the noise source is supported by statements made a meeting held on 18th March 2015 by CBC Environmental Health with the Goods Yard operators (Days Aggregates, Aggregate Industries and Cemex) and TLRA residents where the experts present clearly stated that the most effective position for any noise barrier is AS CLOSE AS POSSIBLE to the noise source.</p> <p>The requirement for Noise mitigation to be sited AS CLOSE AS POSSIBLE to the Goods Yard noise source(s) should be included in the Development Brief for the site so ALL residents in the Tinsley Lane area benefit from the loss of this land to housing development. This would also improve adherence to the principles</p>		

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					<p>aspired to in Section 5.46 which states "This is most notably the case at the south-east and south-west of Manor Royal, where there is little separation between nearby residential development and the Main Employment Area. Recognising the scope for conflict in these areas, Manor Royal Buffer Zones at Tinsley Lane and Tushmore Lane are identified on the Local Plan Map. Within these areas, particular care should be taken to ensure that economic development proposals do not adversely impact upon the amenity and setting of residential uses."</p> <p>The point made in Section 5.6 relating to separation of Business/Industrial Employment areas and residential development cannot be more severe than the close proximity of Tinsley Lane to the safeguarded Goods Yard minerals site particularly when consideration is given to the type of activity undertaken there during 24/7 hours of operation and the associated nuisance relating to unacceptable levels of noise as well as the potential for dust generation.</p> <p>The issue of noise from the Goods Yard and the need for a solution for the wider Tinsley Lane community is acknowledged in the letter from the HCA to WSCC Councillor Peter Lamb which is included in the comments submitted by Tinsley Lane Residents Association on 6th August.</p> <p>I also dispute the statement under "Site Achievability" for Site 45 (Tinsley Lane) Appendix C- Local Plan Key Housing Allocations (Policy H2) that states "..There are no known cost or market factors at this stage that would detract from the viability of this site." It is my contention that this CANNOT BE KNOWN at this stage as neither the operators in the Goods Yard nor CBC have come forward with any robust solution to the noise issue which, to be solved once and for all, for all residents in the Tinsley Lane area, requires a robust solution to be put in place AS CLOSE AS POSSIBLE to the noise source.</p>		

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					<p>I also feel I must comment on the statement under "Action Required/Constraints" for Site 45 (Tinsley Lane) Appendix C- Local Plan Key Housing Allocations (Policy H2) which states "..At the request of the Council, the landowner has undertaken a number of technical studies with supporting mitigation including open space, acoustic, air quality, transport and contamination survey to demonstrate the suitability of the site for housing."</p> <p>The fact that they have presented studies does not in itself does give them validity as at the public hearing these studies were subjected to reworking which resulted in wildly different interpretations being presented on behalf of the HCA where initially the Goods Yard noise situation was interpreted as no more than a minor issue only for a subsequent report to be issued (using the same data) indicating it was much worse.</p> <p>The later report incidentally being submitted (in fragments) after the closing date for submissions to be considered at the Inspectors Local Plan Examination hearing had passed.</p> <p>Regarding traffic access I am still of the opinion there are issues with Tinsley Lane and its junctions with the Gatwick Road (particularly at the southern end).</p>		

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REP/040	Tinsley Lane Residents Association	Policy H2: Key Housing Sites Tinsley Lane, Three Bridges	NC	NC	<p>The Tinsley Lane Residents' Association wish to register the following comments to the Local Plan modifications regarding the sports fields site east of Tinsley Lane.</p> <p>1) The reduction in the proposed number of dwellings for this site is still insufficient to mitigate the severe problems of increased traffic generation due to the restricted access to the site. Gatwick Road is already congested at peak times even without the additional traffic from Forge Wood but this is the only access to Tinsley Lane and the proposed development site.</p> <p>2) The Development brief must include the requirement for noise mitigation measures for the goods yard to protect all dwellings in proximity to the site as detailed in section 6.53.</p> <p>Section 6.53 ("Tinsley Lane is located in close proximity to Crawley Goods Yard (Goods Yard) which is a safeguarded minerals site. Development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on its important minerals function"</p> <p>It is stated in the report that the " aggregates goods yard to the north of the site would need to be considered in design and mitigation of any properties" The existing houses in Tinsley Lane were built BEFORE the night-time noise producing activities were started in the goods yard and if the noise levels produced are now unacceptable for new dwellings then they are also unacceptable for the existing ones.</p> <p>A key objective of the Local Plan is: Sustainability Appraisal Objective Objective Three – To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.</p>	<p>The Tinsley Lane Residents' Association respectfully request that the development brief for the land east of Tinsley Lane includes wording to the effect that " <u>Noise mitigation measures be included that reduce the night-time noise from the goods to acceptable levels for all new and existing residents in the Tinsley Lane area.</u>"</p>	NC

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					<p>If noise mitigation measures are required for any new builds on the site then it is the duty of the Council to ensure that, as stipulated in the Local plan, these measures should also apply to the existing built environment. As noise barriers are most effective when placed as close as possible to the source of noise there is in fact no conflict of interest here but it needs to be included in the development brief when this is prepared by the Crawley Borough Council. The HCA are aware of this and, as indicated in their attached letter to Councillor Peter Lamb on this subject, would be willing to consider this in their development proposal.</p> <p>If the cost of this is a problem then use of the community infrastructure levy could be considered.</p> <p>(Community Infrastructure Levy - CIL regulations published in April 2010 allow Local Authorities to develop a schedule to charge all new development for contributions to infrastructure requirements created by the development.)</p>		
REP/002	Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd. Firstplan	MM28 Policy H2: Key Housing Sites Tinsley Lane	NC	NC	<p>The changes to Policy H2 are supported, including the text setting out that 'development must be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site'. The requirement for a Development Brief is welcomed and should be subject to public consultation.</p> <p>Our client's still have concerns about the potential for conflicts between the Goods Yard and the Tinsley Lane Site. The noise modelling which has been undertaken so far has shown that noise arising from the Goods Yard and from associated train unloading activities would be classified by relevant guidance (BS4142:2014) as 'significant adverse impact' for day-time and night-time, using worst case assumptions. Clearly significant mitigation will be required if this site comes forward and, even if this is achieved;</p>	Our client still considers that Tinsley Lane cannot be considered to be a sustainable development and should therefore not be allocated in this Local Plan	NC

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					our clients are concerned about the potential for future alterations to the properties which may undermine mitigation measures.		
REP/079	HCA	MM28 Policy H2	YES	YES	The HCA support the amendment to the opening paragraph to Policy H2, where the text has been modified to clarify that the capacity figures are indicative. The HCA support this approach which will ensure identified housing allocations perform to their full potential in contributing to the delivery of Crawley Borough Council housing supply requirements.		YES
REP/079	HCA	MM28 Policy H2 Tinsley Lane Allocation	YES	YES	The HCA is fully supportive of the Tinsley Lane Housing & Open Space allocation and supports the definition of the site as 'deliverable'. The HCA intends to bring forward the site for development in the short term in collaboration with the local community and neighbouring users, and will work with the Council to prepare a development brief or planning application. The HCA support the amendment to the opening paragraph to Policy H2, where the text has been modified to clarify that the capacity figures are indicative. The HCA support this approach which will ensure identified housing allocations perform to their full potential in contributing to the delivery of Crawley Borough Council housing supply requirements. The HCA will progress the design and development of the Tinsley Lane site in consultation with the Local Planning Authority, key stakeholders such as the Goods Yard operators, Oakwood Football Club, and the local community, alongside statutory consultees such as Sport England and Natural England. The design layout will be progressed in a manner which is sensitive to surrounding users, and responds to the site's		YES

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					opportunities and constraints, whilst ensuring the viability of the site is maintained.		
REP/058	Southern Water	Policy H2: Key Housing Sites	NC	NC	<p>We note that a number of main modifications have been made to Policy H2, including development criteria for several of the sites. Unfortunately these changes have omitted to include the amendments that we proposed relating to the Forge Wood site and the Southern Counties site.</p> <p>To re-cap, we previously explained that we had carried out individual, site specific, water distribution capacity checks on each of the potential developments (with dwelling numbers indicated) listed in policy H2, in line with paragraph 162 of the National Planning Policy Framework.</p> <p>We found that there is currently inadequate capacity in the network adjacent to two of the sites:</p> <p style="padding-left: 40px;">Forge Wood, Pound Hill (1,900 dwellings) Southern Counties, West Green (218 dwellings)</p> <p>Whilst we said that this should not be seen as a showstopper to development because additional capacity can be delivered in parallel with the development. We stressed that we look to Local Plan policies to support delivery of necessary infrastructure in parallel with development, in line with the National Planning Policy Framework, in particular paragraph 157 which states that Local Plans should "plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework" (our highlight).</p>	<p>Proposed amendment:</p> <p>In order to ensure that site specific infrastructure requirements are considered early in the planning process, and to make the policy effective in terms of infrastructure delivery, consistent with the National Planning Policy Framework, we propose the following additional site-specific policy text for Forge Wood and Southern Counties:</p> <p><u>The development should provide a connection to the water distribution system at the nearest point of adequate capacity, in collaboration with the service provider.</u></p>	NC

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REP/104	Historic England	Policy H2: Key Housing Sites (and supporting paragraph 6.54) Land east of St Hill	NC	NC	We support the additional wording in Policy H2 Key Housing Sites (and supporting paragraph 6.54) in respect of the protection of the group of heritage assets in Pound Hill, and in particular the setting of The Moat scheduled monument; the character of Worth Conservation Area; and, the setting of Worth Church, but in this case we suggest replacing “context” with “setting” in sub-paragraph vi (for consistency and clarity).	we suggest replacing “context” with “setting” in sub-paragraph vi (for consistency and clarity).	NC
REP/023	Environment Agency	Policy H2: Key Housing Sites Land east of Street Hill, Pound Hill & 6.54	NC	NC	Policy H2 Land east of Street Hill, Pound Hill & 6.54 We would recommend that this policy identifies the Gatwick Stream as an important ecological feature of the site. As a greenfield site there should be no development within 30 metres of the watercourse, and plans to manage the site (Local Wildlife Site) should pay particular attention to the ecological enhancement of the stream corridor and floodplain.		NC
REP/112	Mr & Mrs Sharpe	Policy H2: Key Housing Sites Para 6.54 of CBC 001f June 2015 Worth Conservation Area Land East of Balcombe Road/Street Hill	YES	YES	We believe that the area that the Inspector suggested for 15 dwellings is appropriate under certain conditions. 1. In the Crawley BC Statement in 2003 concerning “Worth Conservation Area” comment was made as follows: “ Parking continues to be a problem along the road leading to the Church. This is due to the large number of special events that are held at the church particularly weddings, christenings which attracts significant numbers”. I would add funerals to this. The document goes on to say “ The Borough Council would consider favourably a car park for the Church provided that it was carefully designed and integrated into the landscape”. WE BELIEVE THAT THIS PROVISION SHOULD BE MADE A CONDITION OF ANY DEVELOPMENT AND PROVIDED AT THE COST OF THE DEVELOPER. 2. The area south of the Church has not been maintained in a state appropriate for a Conservation Area. WE WISH THAT AS PART OF ANY DEVELOPMENT THIS WOULD BE RECTIFIED.		YES

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REP/107	The Revd Canon Anthony Ball Chair, Worth Conservation Area Advisory Committee	MM28 Policy H2: Key Housing Sites Land East of St Hill	NC	NC	<p>I write in response to the invitation to comment as part of the current consultation process on modifications to the Crawley Local Plan. I have tried to do so on the form provided on the website but have been unable to download an editable version. Nonetheless, I believe I have included all the requested information below.</p> <p>My full name and address are given at the foot of this e-mail, along with a contact telephone number. I write as Chair of the Worth Conservation Area Advisory Committee. The Committee considered that the consultation was sufficiently important to hold a public meeting in order to give as representative a response as possible. This meeting was held from 7.00 to 8.00 p.m. on 10th August in St Nicholas' Church, Worth and was attended by over 80 people (principally local residents as far as we could determine). It was organised in collaboration with the Borough Council (officers and councillors) and billed as an opportunity to "find out more" about the proposal to allow development of 15 dwellings on "Land East of Street Hill" (Final Main Modification reference MM28, policy H2).</p> <p>There was strong opposition amongst those present to the inclusion of the Inspector's recommendation in the final Local Plan. The primary response is, therefore, that the modification is not "sound" on the grounds that it is not "justified". In our view the addition of these 15 dwellings to the plan makes such a small impact on meeting the overall housing need that it does not justify breaching the principle of not allowing building development within the Conservation Area, and encroaching closer on St Nicholas' Church. A 'thin edge of the wedge' argument. The suggested amendment to the draft document is, therefore, to delete the section dealing with 'Land East of Street Hill'.</p> <p>Opposition to the proposed modification was also expressed in a feeling that the local infrastructure (roads particularly, but also schools) were already inadequate to meet local needs and</p>	<p>There was a desire to see a reversal of the degradation of the SNCI (even without the concession of the proposed dwellings) and a strong (almost unanimous) feeling that the proposal should be linked to achieving one of the key objectives of the Conservation Area - "improving local parking facilities and other visitor facilities" (Worth Conservation Area Statement). We would suggest wording to this effect either as a continuation to vii. or as a (new) tirit viii. This last struck a particular resonance with local residents given the extent of on-street parking during the frequent special events (weddings, funerals and baptisms) and regular services at the Church.</p>	YES

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					<p>additional dwellings would aggravate this. There was also concern about whether the character of any dwellings that might be erected would be appropriate to the area.</p> <p>However, the meeting also considered what amendments to the proposal would be desirable if the modification were retained notwithstanding its opposition (and the Committee wishes to acknowledge the pressure that the Inspector's recommendation puts on the Council).</p> <p>I trust that these comments are helpful. I should be happy to attend any meetings at which they are to be discussed.</p>		
REP/102	Sussex Gardens Trust	<p>Policy H2: Key Housing Sites</p> <p>Land East of Street Hill</p>	NC	NC	<p>Thank you for drawing this matter to the attention of the Sussex Gardens Trust</p> <p>The Trust is naturally disappointed that it has been felt necessary to propose building further housing in this visually sensitive area, particularly as the site has been established as a park or garden of historic interest. That it has been neglected for many years and allowed to overgrow is not a reason for its development.</p> <p>Nevertheless, the Trust takes some comfort from the intention to limit the development, and to build in the form of loose knit low density housing, thus protecting much of the garden landscape. Mitigation of any harm caused, through the high quality enhancement of the remainder of the site, is welcomed, and in this respect the Trust hopes that this provides the opportunity to deliver the works recommended for this site in the 2013 report on Crawley's parks.</p> <p>The Trust supports the criteria that any development will be assessed against, and would be pleased to comment on the proposed development brief before its final adoption.</p> <p>Once again thank you for consulting with the Trust.</p>		NC

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REP/101	Sussex Wildlife Trust	MM28 Policy H2: Key Housing Sites Land east of Street Hill	NC	NC	<p>The Sussex Wildlife Trust objects to the inclusion of Land east of Balcombe Road/Street Hill, Pound Hill as a developable site. The entirety of the site is designated as Worth Meadows Site of Nature Conservation Importance (SNCI) and as such, should be protected from development. Local Wildlife Sites play a critical conservation role and are a core element of Crawley Borough's natural capital.</p> <p>We do not agree that the development of this site is consistent with the NPPF's aim for planning to contribute to the conservation and enhancement of the natural environment. In particular this allocation does not conform to the Government's commitment to 'establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF paragraph 109).</p>	<p>We believe this key site should be removed from the plan, however if it remains, then the additional policy wording needs to be modified further for clarity and to make the policy consistent with the NPPF. We suggest the following amendments:</p> <p>Point iii. of the policy is not clear and does not make grammatical sense. The word 'reflect' should be removed and the point amended to: 'ensure no significant harm to, and should enhance the locally designated historic parkland'.</p> <p>Point v. should include the addition of 'and enhance' to conform to paragraphs 109 and 117 of the NPPF. For clarity, the complete sentence would be: 'limit harm to, and enhance the species rich meadow grassland which contributes to the Site of Nature Conservation Importance'.</p> <p>The long-term commitment to ecological enhancement and proper management (point vii.) should include the entirety of the SNCI, not just the area 'not affected by the development'. NPPF paragraph 118 states that 'opportunities to incorporate biodiversity in and around developments should be encouraged'. By including the development area within the Ecological Management Plan the council can ensure a holistic approach to creating net gains for biodiversity and the retention and creation of green corridors and ecological</p>	NC

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						<p>enhancements throughout the development. We suggest the following wording: 'be accompanied by a longterm commitment to the ecological enhancement and proper management of the entire SNCI, including the area to be developed, to ensure net gains to biodiversity'.</p> <p>The Sussex Wildlife Trust supports the requirement for detailed ecological assessments and adequate mitigation and compensation measures. The development of this site should create net gains for biodiversity. However as approximately a third of the SNCI will be lost to development, we feel there should be a specific requirement for the creation of compensatory habitat offsite with the aim of this land being designated as a SNCI in the future. This would bring the policy in line with paragraphs 117 and 118 of the NPPF.</p> <p>The new paragraph 6.54 should be amended to reflect the above points. In particular the Sussex Wildlife Trust does not agree that <i>'the potential impact of the development and long term degradation of the valuable habitat... can be mitigated against through the appropriate high quality enhancement of the remainder of the site'</i>.</p> <p>Whilst onsite mitigation is necessary, offsite compensation should also be</p>	

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						included to ensure that the integrity of the Borough's ecological networks are not compromised. Although designated sites do not make up the entire natural capital of the Borough, they are a core element and the Council should be working towards designated more sites, not reducing the extent of existing sites. Similarly we request that the wording around the 'appropriate scheme for the future management of the SNCI' also be amended to include the entire site, not only the remaining two-thirds not affected by development.	
REP111	Rector Worth Parish The Revd Canon Anthony Ball	MM28 Policy H2: Key Housing Sites Land east of Street Hill	YES	YES	I have had a considerable struggle with the website to try and submit comments and have resorted to e-mail - and given priority to the response in my previous e-mail (submitted as Chair of the Worth Conservation Area Committee). However, I do hope that it will be possible for you to consider the comments below that are offered in my capacity as the Rector of Worth (so representing those using St Nicholas' Church) and, but less significantly, as the resident whose house faces the field in which the proposed dwellings would be built. I consider the modification dealing with the "Land East of Street Hill" (Final Main Modification Ref MM28, policy H2) to be legal and sound in the light of advice that the only way to ensure the proper management of the SNCI is through "section 106" provisions in any future planning approval. Indeed, I am aware of a number of local residents who would be prepared to contribute to the purchase of the remaining land (to ensure it remains a SNCI) were that to be an option as part of any future 'project' that seeks to balance the development and conservation needs. I am		YES

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					<p>concerned about the impact on the area, and in particular the environs (and views of) the church that a long-term absence of careful management of the SNCI might have.</p> <p>I would also suggest that explicit reference is made to "improving local parking facilities and other visitor facilities" in the amended Local Plan. Given the absence of nearby public transport, parking is a major issue for those who use their parish church but do not live in the immediate vicinity, and the current proposal might provide a unique opportunity to address this issue (as well as the wider question of facilities for those using the church and Worth Way).</p> <p>I would be happy to express my views to the Inspector in any additional Examination Hearing.</p>		
REP/095	Mr Derek Portsmouth	MM28 Land east of Street Hill	NO	NO	<p>When i tried to click "here" for legal definition there is no link set up, so I can't comment on the legality as such, but considering the proposed site is within the Worth Conservation Area then it's legality is dubious. Of course re-zoning the area would achieve legality, albeit on a technicality</p> <p>No, this is not sound logic. Once you lose valuable community green space it is gone forever and in this case represents very little gain. With a major development such as Forge Wood offering 1900 dwellings within the local vicinity (within approximately half a mile) surely cutting down a conservation area for 15 dwellings is unnecessary and shows wilful disregard for the protection of green space for the local community of Worth.</p>		YES
REP/097	Mrs Julie Lynn Fish	MM28 Land east of Street Hill	YES	NO	<p>The Local Plan has failed to protect various historic buildings along the Balcombe Road, specifically the Lodge House where Maidenbower Business Park now stands. The cottages opposite the Europa Hotel taken as part of the Maidenbower development and the cottages demolished to make way for Junction 10A of the M23. I think the conservation area was rightly established to protect the environs of the oldest working church in the country</p>	<p>I do not think any dwellings should be proposed for this site for the reasons listed above.</p>	YES

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					and changing this will detract significantly from the setting of the church. There is no evidence that this site can be properly accessed given the road layout and adjacent SNCI site. The land is very low lying and prone to flooding which has in the past has significantly affected the Maidenbower development and is therefore not suitable for housing.		
REP/094	Mr Ian Revell	MM28 Land east of Street Hill	YES	NO	<p>I fail to understand how this SNCI site can be put forward by the Planning Inspector as a suitable site for development. I am also shocked by his/her decision can not be reversed and that the only way this land can continue as a SNCI site is if the owner refuses to sell.</p> <p>I am deeply troubled that the remaining two thirds of this site will also be considered suitable for development by the Planning Inspector in the future. It appears to me that this site will ultimately be developed because there is no way of stopping it. If this is the case I would like to suggest that the remaining two thirds of the site should be protected from any possible development in the future. Is it possible legally for this part of the site to be 'adopted/purchased' by the church/local community? Also, is it reasonable to request that any future developer includes a church car park and church hall in their planning application? Please can you clarify what '...as housing allocation with biodiversity and heritage enhancements' quoted on page 94 actually means? I fail to see how any buildings on SNCI land is going to result in this kind of 'enhancements' and would appreciate your comments.</p> <p>Unfortunately I understand that it is but am disturbed to find out that there is nothing ordinary people can do to protect conservation sites such as this. This suggests to me that ordinary people have even less hope of protecting sites important to their communities that don't have this status.</p> <p>For reasons already mentioned and also, we won't know what is actually going to be built on this site until a developer puts forward a planning application. We don't even know where the entrance to the development will be. Issues regarding congested roads and</p>	I would require answers to my questions before I could do this.	YES

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					lack of services (schools, doctors etc) seem not to have been considered.		
REP/093	Elizabeth Gallagher	MM28 Land east of Street Hill	YES	NO	<p>I believe it's legal as central government has passed the law that the inspector can make the decision on any piece of land in the country can be included in a council building programmes. Regardless of any inconvenience to residents or lack of infrastructure for any extra dwellings being built and more families being imported into the area.</p> <p>The inspector has proposed this area for likely housing construction on the grounds of it being partially neglected and the grassland has diminished resulting in encroaching bramble scrub. This land is privately owned and part of Worth conservation area and I am sure if residents had been approached volunteers would have been more than happy to clear this lovely meadow as I am sure they would be very happy to do now. With so much countryside being taken over the eco-system is under threat and this needs to be addressed in a more sensitive manner than has so far been displayed. I hate to think of the animals and insects that will be affected by this decision.</p>	According to the council this proposal is none negotiable and therefore I feel if more families are moving into the area we need better facilities to cope with the rising population for example, roads made more accessible, more schools for local children also as this land is adjacent to St Nicholas church a safe car park and a church/community hall where these new families can become part of the community and help keep the rest of this lovely conservation area safe.	YES
REP/092	Mr Danny Bassington	MM28 Land east of Street Hill	YES	NO	I am very concerned with regard to the proposed planning adjustment because I live just across the road from said development which is next to a low lying area of Maidenbower. To concrete over such a considerable area and build houses would, in my opinion, put considerable strain on the current anti flood measures in place. It is also part of the Worth church conservation area and as such should be left alone. Are 15 dwellings, I would imagine expensive dwellings, be so important.	See previous response	YES
REP/091	Mr Edward Bolton	MM28 Land east of Street Hill	YES	NO	I have no issue with the Inspectors legal rights. The area is designated as a Conservation Area and as such and in keeping with the Council's own comments should be preserved as such and not have its designation altered to one suitable for development. The intention of allowing building with housing suitable to the area is misleading - to the left of the proposed site	Sorry, just remove the modification all together.	YES

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					is the Crawley Business Park which is a mixture of Offices, and Car Showroom, Car wash and a huge Storage Company - plus the recently added Coaching Halt Inn - hard to see how an housing development would be restrained against such a back drop. To designate the area suitable for 15 dwellings and amend the Conservation area is not sound nor does it make any substantive change to the Council's requirement to build circa 7,000 new homes by 2030. i.e 0.2%.		
REP/090	Mr David Meadmore	MM28 Land east of Street Hill	NO	NO	<p>The Worth Conservation Area boundary ensures no direct intrusion as it follows natural boundaries such as the Bower. The proposed recommendation although mitigated to 15 dwellings moves urban development within sight and direct impact on the SNCI. Also due to the escarpment of the land no practical screen or landscaping would hide such urban development. It is the clear view of local residents and local Councillors that there is no valid reason for this land to be designated for building. The Planning Inspector is mistaken that this is a suitable plot of land for building and should not overrule strongly held local views .</p> <p>Despite recent flood protection further up the Balcome Road (over M25) this low level meadow will still be subject to flooding. Heavy piling or construction of flood protection would further increase the impact of such a development</p>	<p>Delete modification</p> <p>Add the following conditions:</p> <p>a) any building area be screened from the top escarpment such that the view of the conservation area is not compromised.</p> <p>b) any access to the site (assumed Street Hill) should not compromise or adversely affect the remaining conservation area</p> <p>c) any development line should have a distinct and suitable spacing from the edge of the conservation area. (no building right up to the line or domestic urban gardens backing directly into SNCI.</p> <p>d) all mature trees to be recorded and mandatory that construction does not remove or excessively reduce (even by accident) those designated</p> <p>e) that the dwellings are modest in size so that the cumulative impact (cars) is not excessive</p> <p>f) that the density is fixed at 15 dwellings of no more than two floors each.</p> <p>g) that the developers will totally protect the SNCI during construction and contribute to the restoration and support of the SNCI affected by the works.</p>	YES

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						h) that any development would be dependent on there being no excessive drainage or flood works required which would impact the wider environment.	
REP/089	Mr John Seddon	MM28 Land east of Street Hill	YES	YES	Any proposed development of the land east of Balcombe Road/Street Hill should take into account the current unsatisfactory parking arrangements for St Nicholas Church. When the church is in use, cars currently park along both Worth Way leading up to the church and street Hill/ Church Road up to Saxon Road. This stretch of road is particularly narrow and not suitable for such use. I would consider driving along this stretch of road at such times is dangerous, particularly 20 mile per hour speed limit is generally ignored by motorists.	My proposed modification to the plan paragraph 6.54 is to ease traffic congestion when the church is in use making it safer for motorists , cyclists and pedestrians	YES
REP/088	Mrs Kim Howell-Lewis	MM28 Land east of Street Hill	NO	NO	The land that you're proposing to build on is a conservation area, where people can ride on their bike, walk and enjoy the beautiful countryside.	As previously answered	YES
REP/087	Mr Andres Cachaldora	MM28 Land east of Street Hill	NO	NO	There is no LP number published on the Crawley council website. This is in reference to the 15 dwellings for Worth at the bottom of street hill, "Housing, Biodiversity and Heritage Site Land east of Balcombe Road/Street Hill, Pound Hill (developable) 15 dwellings"	This is a heritage site and the proposed plan for dwelling will affect the conservation area. I would recommend the inspector to come to the community church and hear the concerns of people in the area. Please contact me on [REDACTED] or [REDACTED] to arrange No information was shared with the public prior to the notice. All resident have been give information very late.	YES

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REP/086	Mr Malcolm Fish	MM28 Land east of Street Hill	YES	NO	The proposed area of development within the site has no natural access point, other than through an historic bank and hedgerow which includes trees currently protected by TPO, the breach of which will fundamentally change the character of the main access route to the church. I fail to see how any development can be achieved that adequately protects the historic moat site. If the area flagged for housing is sold separately to the remainder of the SNCI land, how can any measures to protect it be enforced as the developer will have no control over that part. The proposed site for housing abuts access roads only at an existing junction that does not lend itself to an additional access road, it would only be possible to provide access through the designated SNCI site, unless access was through the business park to the South..	Site access only to be allowed through the business park to the South.	YES
REP/085	Mr Simon Hall	MM28 Land east of Street Hill	YES	NO	The inclusion of this Street Hill modification and inclusion within the Local Plan goes against good planning policy. The conservation area in question has huge heritage value with the Grade I listed church within its area. As such, the council has a duty to prevent damaging construction impact to this area along with a duty to enhance the area. The grade I listed church within this area has views over the surrounding areas that at present are visually attractive. The addition of 15 houses within this area would be detrimental to the existing views and damaging to the conservation area in general.	remove Street Hill modification in total from this document.	YES
REP/096	Mr and Mrs Booker	MM28 Land east of Street Hill	NC	NC	Dear Sir or Madam, following our attendance at the Public Meeting at St Nicholas Church at Worth at 7.00pm last evening, which was Chaired by the Rector, the Rev'd, Canon Anthony Ball and had as a Council Representative – Mr Bob Lanzer (when approximately 80+ persons attended) we would wish to record our total displeasure at any attempt to erode any of the Worth Conservation Area, as it is at the present time, and also reject any attempt to build any private dwellings on the area of land highlighted for that purpose by the Planning Inspector, that is on land east of Street Hill. Yours faithfully, Malcolm & Brenda Booker, [REDACTED]		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>██████████ (Please note we have been Crawley residents, at the above address, for more than 26 years).</p>		
REP/099	RA Jessep	MM28 Land east of Street Hill	NC	NC	<p>I attended a public meeting on 10th August 2015 at St Nicholas' Church in Worth where I understood the consultation on the Local Plan closed at midnight tonight. I have now seen on your website the consultation closed at 5pm today. Nevertheless I trust you will consider my views.</p> <p>I understand the Government Inspector 'suggested' houses are built in part of Worth Conservation Area, which is designed to preserve the setting of our grade 1 listed church that is some 1200 years old and is the third oldest in the UK. The land is itself also a site of nature conservation importance and includes a moat.</p> <p>I see CBC have now modified their plan to 2030 to propose the moving of the built up boundary into the aforesaid conservation area.</p> <p>I strongly object to this. The development of the conservation area with housing cannot add to the biodiversity of this area and severing the moat from the remainder of the conservation area will not be a heritage improvement. The whole principle of the conservation area is to preserve the church and its environs, which will be significantly damaged by the effective proposed development of this land. The fact that CBC has allowed developments in lfield should have no bearing on the need to preserve Worth Conservation Area, which is a unique and different entity.</p> <p>Worth Conservation Area should not be destroyed (even if only in part) by our generation. Consequently, CBC should not include any of this area within the revised built up boundary</p>		NC

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REP/105	Mr Chris Finch	MM28 Policy H2: key Housing Sites Land east of Street Hill	NC	NC	<p>I have been passed your name by a neighbour who has informed me of the proposal for development of some 15 properties in the plot of land adjacent to Street Hill in Worth.</p> <p>I must say that, having been working away recently, that I was unaware of the proposal and would object most strongly to the proposed development.</p> <p>I have been living in Bethune Close (7) for several years now and have seen the following negative effects which would further increase significantly if a denser population came to be in the area:</p> <ol style="list-style-type: none"> 1. The rise in population density has steadily increased in the area at the apparent detriment of the ecology; the amount of micro- and Eco- climates has decreased to the extent where, I believe, there are not many places left that are unmanaged such that wildlife can thrive. 2. The traffic density has increased significantly within Street Hill and the adjacent streets, with significant congestion at peak times, at weekends when church traffic is increased, and during inclement weather. With the already dangerous 'T' junction at the bottom of a relatively steep slope, further traffic would be both unsafe and cause noise and pollution levels over allowable levels for the local residents; the other option of going through the main street towards Turners Hill road are also not viable with restricted road widths and weak bridge crossings. Basically, the road network currently in place is struggling to cope now without further pressure being added. 3. The whole ethos of the area is centered around an historic church, and the cottages at the entrance to Worth Church epitomize the style and character of the area - new dwellings to complement this are unlikely to be viable. <p>Can you please pass this on to the Inspector for consideration.</p>		NC

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REP/055	Mr Richard Bucknall Mr Tony Fullwood (Tony Fullwood Associates)	MM28 Policy H2: Key Housing Sites Para 6.54	YES	NO	<p>Introduction The submission strongly supports the allocation of Land east of Balcombe Road/Street Hill for housing development in Modified Policy H2. There has been a long-term resistance by the Council to accepting development at this site. The detail of Policy H2 and associated paragraphs continue to illustrate the Council's reluctance towards seeing this site provide necessary housing within their area despite the findings of the Inspector. Detailed objections are set out below:</p> <p>Indicative Key Housing Site Land East of Balcombe Road/Street Hill is allocated as an Indicative Key Housing Site (my emphasis). Paragraph 6.54 states: ...with the area most likely to be suitable for housing indicated within the southern part of the site (my emphasis) The SHLAA confirms the site (shown as site reference 223 below) is suitable for housing development. However, in error, the SHLAA states that only part of the site shown on the map below, particularly the southern section would be suitable for the development of a maximum of 15 dwellings.</p> <p>The status of the suitability of the site discussed, and visited, during the Examination is currently confused. The Inspector's conclusion is that Land east of Balcombe Road/Street Hill as proposed at the Examination is suitable for housing development. Indeed, the Borough Council's Schedule of Proposed Modifications to the Submission Local Plan all refer to including Land east of Street Hill as a Housing Allocation with Biodiversity and Heritage enhancements to reflect the Inspector's Preliminary Findings 1.</p> <p>There appears to be a reluctance to accept the Inspector's conclusion that this site is suitable for development. As with all allocated sites, there will be a need to develop an appropriate scheme which respects relevant planning policies and the</p>	<p>Proposed Revised Policy H2: Key Housing Sites</p> <p><u>Deliverable</u></p> <p>Housing, Biodiversity and Heritage Site Land east of Balcombe Road/Street Hill, Pound Hill (deliverable) 20 dwellings The design and layout of the development of this site must:</p> <ul style="list-style-type: none"> i. respect the rural character of the Worth Conservation Area; ii. concentrate the residential element and associated infrastructure within the area allocated for housing,; iii. allow a suitable unbuilt margin around the archaeologically sensitive Moat; (v) manage the species-rich meadow grassland which contributes to the Site of Nature Conservation Importance outside the Key Housing Site vi. maintain a woodland vegetation barrier between the development and the church, to retain the historic significance of the context of Worth Church <p>Detailed ecological and archaeological assessments must be carried out and adequate mitigation and compensation measures provided to offset any harm caused to the site's important assets.</p> <p>Proposed Revised Paragraph 6.54 6.54 Land east of Balcombe Road/Street Hill has a number of heritage and</p>	YES

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					<p>acknowledged site constraints. Nevertheless, the suitability of the land east of Balcombe Road/Street Hill as proposed at the Examination should be confirmed as a housing allocation within the Housing, Biodiversity and Heritage Site.</p> <p>At present, the vague reference to the southern section of the site in Policy wording and an Indicative Key Housing Site on the Proposals Map and key Diagram and the supporting evidence base (SHLAA) create considerable uncertainty about site suitability. In this respect, the modification to H2 and the Proposals Map is neither positively prepared based on a strategy which seeks to meet objectively assessed development requirements nor justified.</p> <p>The most appropriate strategy would be to remove the term 'Indicative' and to allocate the site shown as site 223 as a Key Housing Site within the Housing, Biodiversity and Heritage Site. This would help meet one of the NPPF Core Planning Principles set out in Para 17:</p> <p><i>planning should be genuinely plan-led...They [plans] should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</i></p> <p>Capacity of the site</p> <p>The Inspector has indicated in his Preliminary Findings 1 a capacity of about 15 dwellings for Land east of Street Hill. Modified Policy H2 (Key Housing Sites) correctly adds some flexibility regarding the capacity of each site: <i>To ensure the delivery of the overall minimum housing figure set out in Policy H1, as supported by the Housing Trajectory, indicative capacity figures for each site are shown in brackets below.</i> At the Examination, the Council indicated to the Inspector that the capacity figures represented minimum figures in striving to meet the housing need. However, modified paragraph 6.54 of the Local Plan refers to a maximum capacity of 15 dwellings being likely to be appropriate (my emphasis).</p>	<p>environmental constraints which must be carefully considered and addressed through the design and layout of a development scheme. These include:</p> <ul style="list-style-type: none"> i. the setting of the Grade I listed Church; ii. the Worth Conservation Area iii. the Site of Nature Conservation Importance iv. the archaeological sensitive asset: the Moat; v. the Historic Park and Garden; <p>To ensure an appropriate balance between the need for housing and the important heritage and environmental assets and characteristics of the site, a capacity of approximately 20 dwellings is considered likely to be appropriate. Harm to the character of the Worth Conservation Area must be minimised by a scale and design of development which respects the rural nature of the Conservation Area, as a loose-knit low density layout clearly distinct from the suburban character of Maidenbower. The potential impact of the development and long term degradation of the valuable habitat on the site and the harm to the Moat can be mitigated through appropriate high quality enhancement. Therefore, an unbuilt margin around the archaeological asset must be retained with an appropriate scheme for its future management as well as the management of the remaining species-rich meadow grassland which contributes to the Site of Nature</p>	

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					<p>The SHLAA has been updated to confirm the site suitability. Nevertheless, it states: <i>...part of the site, particularly the southern section would be suitable for the development of a maximum of 15 dwellings (my emphasis).</i> Similarly, the summary refers to a maximum of 15 dwellings</p> <p>This is the only Policy H2 or SHLAA site which specifies a maximum capacity.</p> <p>This is contrary to the Inspector's Preliminary Findings and indeed Policy H2 itself which refers to indicative capacity figures for each site but is clearly seen as a back door way for the Council to restrict development on this site.</p> <p>The Council have produced no evidence to set this limit and I suspect no feasibility studies have been attempted. This approach illustrates the reluctance the Council continues to have towards seeing this site provide necessary housing within their area despite the findings of the Inspector</p> <p>The advantages of the housing site have been recognised by the Inspector which are strongly supported. However, there are a number of reasons why 15 dwellings is an inappropriate figure for the Local Plan.</p> <p>1. In a Local Plan which is not meeting objectively assessed needs, in line with the NPPF objective of seeking to boost significantly the supply of housing, the most effective use should be made of the site. In this respect the currently proposed capacity of the site is not seen as consistent with national policy.</p> <p>2. Modified Policy H4 (Affordable and Low Cost Housing) seeks 40% affordable housing from all residential developments of 11 dwellings or more.</p>	<p>Conservation Importance outside the Key Housing Site. Due to the complex character and assets associated with this site, it is shown on the Local Plan Map as a housing, biodiversity and heritage site, with the area which is suitable for housing allocated within the southern part of the site.</p> <p>Local Plan Map Key Diagram The Local Plan Map should refer to a Housing Allocation – not an Indicative Housing Allocation. For consistency, the Key Diagram should refer to a Housing Allocation (Reference Modification MM2</p>	

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					<p>On a site of 15 dwellings, this would result in 6 affordable dwellings leaving 9 dwellings as general market houses. The perverse incentive in limiting development to 15 dwellings would be for landowner/ developer to propose only 10 market dwellings – so achieving an additional house for sale at market value and no subsidy towards affordable or low cost housing. The unintended consequence of a capacity of 15 dwellings in reality is therefore likely to be that the most effective use would not be made of the site; less dwellings overall would be achieved and no affordable homes would be added to the housing stock.</p> <p>3. Modified Policy H3 (Future Housing Mix) states that all housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand with consideration given to the evidence established in the Strategic Housing Market Assessment. The SHMA Northern West Sussex – Crawley Strategic Housing Market Assessment Update October 2012 (Table 18) indicates the demand the different sizes of affordable housing in Crawley as: 1 bed (20%), 2 bed (35%), 3 bed (35%), 4+ bed (10%). In relation to the sizes of market housing, the SHLAA identifies the majority of household growth from increasing single person households. It recommends a mix of house types and sizes on larger sites but declines to specify a precise mix.</p> <p>In terms of land east of Balcombe Road/ Street Hill the Inspector recognises that this would be a loose-knit, low density layout which is clearly different to the suburban character of nearby Maidenbower. The density of built form relative to landscape will need to reflect the character of the area and the constraints identified. Nevertheless, a mix of dwelling sizes is sought within Policy H3 and can be provided within a low site coverage format. Thus a building of the appearance of a large detached house can be subdivided into smaller units (for example, as a semi-detached house or flats). Given the setting and potential for noise screening, it is likely that a larger detached unit could occupy land towards</p>		

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					<p>the motorway. This may also be the case towards the business park.</p> <p>An illustrative layout is included below (Figure 1) simply to provide an illustration of mixed house sizes within a development of low site coverage. Thus, in this outline option, within 9 dispersed properties a total of 21 units would be achieved – helping to meet a range of unit sizes (3 x 4/5 bed; 1 x 4 bed; 6 x 3 bed; 3 x 2 bed and 8 x 1 bed).</p> <p>The site area is measured at 1.8ha and the density of the illustrative layout would be 11 dwellings/ hectare.</p> <p>Clearly there are many variations of this potential layout which could be developed to achieve both a housing development suited to the site and a housing mix sought by the local planning authority and this illustrative scheme should only be taken as supporting evidence rather than a proposal requiring a response.</p> <p>Currently the capacity of the site is not justified as it does not represent the most appropriate strategy based on evidence and therefore this aspect of Policy H2 is not sound.</p> <p>A more appropriate indicative capacity for Land east of Balcombe Road/Street Hill is 20 dwellings.</p> <p>Phasing The site has been promoted as a deliverable site. The Inspector has not stated that the site is not deliverable.</p> <p>In relation to Site Availability the revised SHLAA states that: <i>Due to the constraints on site it has been identified as a developable site, coming forward in the 6-10 year period of the plan. However, this does not prevent a satisfactory planning application coming forward sooner.</i></p>		

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					<p>Nevertheless, Modified Policy H2 (Key Housing Sites) allocates the site as a Developable site (2020/21 – 2024/25). NPPF states that to be considered deliverable, <i>sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years...</i></p> <p>NPPF also states that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.</p> <p>The NPPG (Housing and economic land availability assessment - paragraph 008) states that local planning authorities should involve those with land interests and land promoters in relation to land availability at an early stage. The site has always been promoted as a deliverable site by the landowner. Paragraph 031 defines a 'deliverable site' in the context of housing policy as including those that are allocated for housing in the development plan unless there is clear evidence that schemes will not be implemented within five years.</p> <p>The site owner is elderly and wishes to see the site developed in the short term. The Inspector has established that there are no insurmountable constraints to the site's development. Considerable evidence has been developed for the promotion of the site (including through the Local Plan Examination) and, although this will need to be supplemented, additional surveys could be completed in a period no greater than a year. The number of housing units is not large and will not in itself cause delays in delivery.</p> <p>The allocation of the site as a developable site once again illustrates the reluctance the Council appears to have towards releasing this site to provide necessary housing within their area.</p> <p>The phasing of the allocation of Land East of Balcombe Road/Street Hill means that this part of the plan is not positively prepared based on a strategy which seeks to meet objectively assessed housing need as soon as possible. Nor has the phasing</p>		

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					<p>been justified by evidence. For these reasons, this aspect of Policy H2 is not sound.</p> <p>The site should be identified as deliverable in the Local Plan and there should be a consequent adjustment to the Housing trajectory (Modification Ref. AM181).</p> <p>Outside the Built Up Area The local planning authority has not included the housing site within the Built Up Area Boundary. In order to remain consistent with the Borough Council's published Built Up Area Boundary Review methodology which was before the Inspector at the Examination (LPO56), the site should be included within the Built Up Area Boundary:</p> <p><i>3.2 ...Boundary amendments will also be made in light of proposed strategic development the Built-up Area Boundary.</i></p> <p>Principle 1 also states: <i>The BUAB should include existing commitments and new development adjacent to the boundary.</i></p> <p>Incredibly, the local planning authority is now proposing to amend the methodology used in producing the plan at the Proposed Modifications stage. It really is disingenuous and falls well short of good practice in plan making for the local planning authority to seek to change the methodology for defining the BUAB retrospectively, at this stage of Plan making, and in my view may result in a challenge to the Plan.</p> <p>It is the only housing allocation not within the Built-up Area Boundary.</p> <p>The omission of the housing site from the BUAB would make this H2 housing allocation at Balcombe Road/ Street Hill subject to Policy CH9 (Development Outside the Built-Up Area) which states amongst other requirements:</p>		

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					<p><i>Proposals which alter the overall character of the area must demonstrate that the need for the development clearly outweighs the impact on landscape character and is in accordance with national and local policy.</i></p> <p>The Examination has resulted in this need being demonstrated and the proposed housing development at this site being supported by the Inspector. Whilst this approach may suit the Council in being able to re-run the arguments against development at this site, there should be no need for a future planning application to have to meet the tests of Policy CH2.</p> <p>Instead, there is a need for the Borough Council to clearly signal acceptance of development in this area through the consistent application of mutually interdependent policies.</p> <p>The allocation of the site and the revision to the BUAB would help meet one of the NPPF Core Planning Principles set out in Para 17: <i>· planning should be genuinely plan-led...They [plans] should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</i></p> <p>As currently drawn, the Built-up Area Boundary at Balcome Road/ Street Hill:</p> <ul style="list-style-type: none"> • is inconsistent with the methodology for the evidence base which has been used throughout the plan-making process • would result in an internally inconsistent and incoherent juxtaposition of policies • would not provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency <p>The failure to amend the BUAB around the Balcome Road/ Street Hill allocation would result in the plan not being positively prepared or justified and in this respect would not be sound.</p>		

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					<p>The Proposals Map should show the BUAB extended from the adjoining business park and realigned along the northern boundary of the housing site allocation.</p> <p>Modified Policy H2 Criteria As currently drafted, proposals at the Balcombe Road/ Street Hill site would already have to meet a number of Modified Local Plan policies including</p> <ul style="list-style-type: none"> • CH2 Principles of Good Urban Design □ • CH3 Normal Requirements of All New Development • CH8 Important Views • CH9 Development Outside the Built-Up Area • CH12 Heritage Assets • CH13 Conservation Areas • CH17 Historic Parks and Gardens • H3 Future Housing Mix • H4 Affordable and Low Cost Housing • ENV1 Green Infrastructure • ENV2 Biodiversity • ENV4 Open Space, Sport and Recreation <p>As well as these policies, modified Policy H2 includes 7 additional criteria to meet as well as the need for detailed ecological and archaeological assessments to be carried out together with adequate mitigation and compensation measures provided to offset any harm caused to the site's important assets.</p> <p>In addition these requirements are proposed to be set out in a Development Brief.</p> <p>Criterion (ii) For the reasons set out above, modified criterion (ii) should refer to the area allocated for housing rather than <i>be located within southern section of the site</i>.</p>		

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					<p>Criterion (iii) Modified criterion (iii) is inconsistent with the requirements of Policy CH17 Historic Parks and Gardens. Policy CH17 (Historic Parks and Gardens) already states that the council will support development unless it would have a negative impact on the historic setting and character of the designated Historic Park and/ or Garden. All development proposals within the boundaries of the Historic Parks and Gardens are required to demonstrate, through a Heritage Impact Assessment, that the proposals have regard to the designation, its character, key features and setting of the area and that proposals respect or enhance the area (my emphasis). Policy H2 is inconsistent with Policy CH17 by requiring enhancement to the historic parkland.</p> <p>There is no clear evidence concerning the extent of the historic parkland and the boundary was disputed at the examination (see Desk-Based Assessment: Archaeology South-East, a division of the Centre for Applied Archaeology, University College London). Appendix 1 depicts the other land owned by the landowner of the housing allocation and was previously submitted to the Examination. Enhancement of the historic park and garden was not part of the submission to the examination. The Rectory Garden, ponds and woodland are located on land outside the ownership of the housing proposal. The requirement of criteria (iii) to enhance the locally designated parkland would make this housing proposal undeliverable.</p> <p>With the benefit of a Heritage Impact Assessment the Inspector has accepted that the proposed housing development would cause no significant harm to the locally designated historic parkland. The allocation would therefore be compatible with Policy CH17. There is no need for criterion (iii) which should be deleted to ensure that the Local Plan can be effective and this suitable housing site delivered in the short term.</p> <p>Criterion (v)</p>		

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>Criterion (v) requires proposals to limit harm to the species-rich meadow grassland which contributes to the Site of Nature Conservation Importance.</p> <p>Modified Policy ENV2 (Biodiversity) expects all development proposals to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.</p> <p>The Inspector has called for a balanced approach which accepts the loss of some meadow grassland in order to achieve the enhancement of the remaining rapidly eroding grassland. The approach advocated by the Inspector is strongly supported but it appears that this approach may not strictly comply with criterion (v), as worded, to limit harm to the species-rich meadow grassland.</p> <p>The criterion already duplicates the requirements of Policy ENV2 which more accurately conveys the Inspector's recommended approach to the meadow grassland. Criterion (v) as currently expressed does not represent the most appropriate strategy in following a balanced approach towards meadow grassland and is therefore not justified. Criterion (v) should be amended to:</p> <p>(v) manage the species-rich meadow grassland which contributes to the Site of Nature Conservation Importance outside the housing allocation</p> <p>Criterion (vii) This criterion requires the design and layout of the development of this site to be accompanied by a long-term commitment to the ecological enhancement and proper management of the remainder of the SNCI not affected by the development for the benefit of biodiversity.</p> <p>Appendix 1 depicts the plan submitted to the Examination which shows other land owned by the landowner of the housing</p>		

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					<p>allocation. The other land within his ownership comprises the most important attribute of the SNCI: the species rich meadow. Appendix 1 indicates a total of 3.93ha of the 5.8ha SNCI (two thirds) in his ownership (of which 1.8ha is suitable for housing development).</p> <p>The restoration of the remainder of the meadow grassland not subject to development was proposed and accepted as part of the balanced approach to biodiversity on this site. It is simply not feasible to provide a long-term commitment to the ecological enhancement and proper management of the remainder of the SNCI not within the ownership of the housing site owner. This was not part of the submission to the examination. The requirement of criteria (vii) in relation to the entire SNCI would make this housing proposal undeliverable. Criterion (v), as proposed to be amended above, already covers this aspect of biodiversity management. Criterion (vii) should be deleted to ensure that the Local Plan can be effective and this suitable housing site delivered in the short term.</p> <p>Development Brief</p> <p>The plethora of policies already applying to the site; the adopted Conservation Area Appraisal together with Policy H2 criteria set a highly constrained framework within which to design and layout the development of Land east of Balcombe Road/Street Hill. In addition, significant up to date evidence (which is to be further supplemented in accordance with Policy H2) has already defined the important aspects of the heritage assets and habitats and how they may be protected and enhanced.</p> <p>The development parameters are clear. There is no need to further delay the delivery of a suitable housing site within an area where there is a shortfall of new housing development.</p> <p>The requirement for a Development Brief should be deleted to ensure that the Local Plan can be effective and this suitable housing site delivered in the short term.</p>		

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					PLEASE SEE FULL REPRESENTATION FOR SHLAA EXTRACT, FIGURE 1:ILLUSTRATIVE HOUSING LAYOUT AND APPENDIX 1.		
REP/050	Persimmon Homes & Taylor Wimpey	MM30 Policy H4: Affordable Housing	NC	NC	<p>We continue to object to the retention of a 'Low cost housing' policy requirement in <u>addition</u> to affordable housing to be provided as part of development schemes. Proposed Modification MM30 inserts a requirement to provide "approximately 10% low cost housing" offering up to 10% discount. We do not support this policy requirement and we refer to our Hearing Statement submitted in response to Matter 3 (Question3.13).</p> <p>The principle behind 'low cost housing' is to facilitate the provision of discount to home buyers, specifically first time buyers, but this should be market led and not dictated by policies within a Local Plan. Incentives offered by the house building industry perform the same function and it should be for the market to determine the scale and scope of any discounts offered on new homes as part of their wider strategy for the promotion of new development to the market. To insist upon such discounts within policy is therefore unnecessary and represents an unnecessary intrusion into the sales market.</p> <p>Additional text to this policy confirms that where viability is a concern the Council's first priority will be to lower the expectation of low cost housing. This somewhat undermines the validity of this policy requirement and demonstrates that it is more of an aspiration sought without any solid evidential basis, a requirement that will immediately be diluted should viability of development schemes be questioned. Any such policy requirement, in addition to affordable housing provision must have proper regard to the overall viability of development schemes.</p>		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>The policy also lacks any clear strategy for the implementation of this additional requirement. Modified paragraph 6.70 confirms that this will be set out in the forthcoming Affordable Housing SPD. We object to this approach as the PPG clearly states that supplementary planning documents should be prepared only where necessary and in line with paragraph 153 of the NPPF. To defer such considerations to the SPD is contrary to both the PPG and NPPF and the requirements of H5, in terms of low cost housing, cannot be justified as it is not clear how the policy will operate or what the financial implications will be.</p> <p>Affordable housing provision as 40% is already a significant policy burden on development and when considered alongside other policy requirements such as those set out in CH5, ENV6, ENV7 and ENV9, the further burden placed on development to ensure that 10% of properties are subject to a discount, irrespective of the market demand and other incentives normally provided by the market, represents an excessive policy burden on development and is inconsistent with paragraph 173 of the NPPF.</p>		
REP/027	Gatwick Airport Ltd	MM31 Policy H5: Gypsy, Traveller and Show People	NC	NC	<p>In our representations to the Examination in Public GAL expressed concern that the noise criteria - criteria (a) - of the policy for assessing the acceptability of other (non-allocated) proposals for Gypsy, Traveller and Travelling Show People should be reconsidered.</p> <p>GAL explained that it was unclear about the distinction between 'long term temporary sites' and 'temporary sites' but in any event considered that the noise criteria for 'permanent sites' (i.e. greater than 57dBA leq) should also apply to 'long term temporary' and 'temporary' sites. The reason for this is that the type of residential accommodation utilised by the travelling community cannot be adequately sound insulated and mitigated against noise exposure. As such the proposed noise thresholds of 60 and 66 for these temporary sites is unacceptably high and could, without the ability to provide adequate mitigation, result in unacceptable health impacts to the traveller community.</p>	<p>We suggest that alongside the current proposed modification MM31 criteria (a) policy should be reworded as follows:</p> <p><u>Criteria for Assessing other Proposals</u> <u>Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:</u> <u>a) is not subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary sites of up to one month, and 66 decibels for temporary sites;</u></p>	NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/011	Natalie Bingham	Policy H5: Gypsy, Traveller and Show People	NC	NC	<p>I just wanted to ask the question re proposed Travellers site at Buchan park;</p> <p>Have CBC had a costing for the work needed to be done to make the access to the site safe and if so how much? and who will pay for it.....CBC ?....or WSCC ?.....as each one has said the other would pay for it in the past.</p> <p>Just a quick question. Surely for a site to be "Reserved" for the future, it must be deemed to be financially possible to put in place? If it's taken this long to find a site earmarked for the future and when the time comes to utilise that site it is deemed too expensive to make it safe etc then more years will go by looking for an alternative. Surely is it not best practice to determine now if this site would be financially viable for if needed in the future?</p>		NC

Chapter 7: Environment

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/041	Mr Colin Maughan	Environment Chapter Policy ENV2: Biodiversity National Planning Policy Framework Sites (new heading)	NC	NC	<p><i>It is probably too late now, but under “Ancient Woodland and aged or veteran trees” there is no requirement to have a list of approved tree surgeons.</i></p> <p><i>Whilst most of the work done on Crawley’s trees is satisfactory, there are two problems:</i></p> <ol style="list-style-type: none"> <i>1. Probably for environmental reasons, ivy is allowed to kill aged trees-cutting into ivy stems is not satisfactory, as it is a parasite, and continues to kill them.</i> <i>2. Some of the appointed tree surgeons do sound work, but others are untrained and ruin valuable urban specimens. There are two such in Fontwell Road near my home in Furnance Green.</i> 		YES
REP/023	Environment Agency	Policy ENV2 Biodiversity	NC	NC	<p>We would recommend that rivers and streams are also included under 3. Development needs to retain a buffer zone and enhance rivers and streams in order to deliver mitigation measures identified in the Thames River Basin Management Plan.</p> <p>Developments must not prevent the delivery of the River Basin Management Plan, therefore by including delivery as part of developments it ensures the plan is acted upon.</p>		NC
REP/101	Sussex Wildlife Trust	MM32 Policy ENV2	NC	NC	<p>We broadly support the modifications made to policy ENV2 and agree that they provide more clarity and conform better to the NPPF. However we feel that section 3, bullet point 4 needs further modification to remove ambiguity.</p> <p>We are concerned that the current wording could be interpreted as referring only to Habitats of Principle Importance that are identified by the NERC Act, Biodiversity Action Plans and mapped within Biodiversity Opportunity Areas (BOA). Paragraph</p>		NC

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					<p>117 of the NPPF advocated the preservation, restoration and re-creation of all priority habitats not just those mapped within BOA's.</p> <p>We therefore suggest that for clarity the sentence is split to create two bullet points:</p> <ul style="list-style-type: none"> • 'Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans. • Biodiversity Opportunity Areas' 		
REP/072	Wilky Group Savills Simon Fife	MM32 Page 87 Policy ENV2	YES	YES	<p>The changes to Policy ENV2 are supported in that they provide greater clarity to the policy and how it is to be applied in order to reflect the hierarchy of environmental designations. The revised policy broadly reflects Government policy contained in the NPPF (para. 113) that policy should make a distinction between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution they make to wider ecological networks.</p> <p>In particular, the policy as modified, sets out the local sites, habitats and species outside designated sites, including Habitats of Principal Importance mapped within Biodiversity Opportunity Areas (BOAs).</p> <p>This means that the policy applies to specifically to the Habitats within the BOAs, acknowledging that the BOAs offer opportunities for biodiversity enhancement in the context of any development proposals, and subject to avoiding significant harm to assessed biodiversity under the final part of the policy. Para. 7.18 clarifies that the emphasis is on the restoration and creation of habitats within BOAs.</p> <p>The Modification is sound and reflects Government policy contained in the NPPF.</p>	No change to Policy ENV2.	NO

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/072	Wilky Group Savills Simon Fife	AM105 Policy ENV2 p.88 para 7.18	YES	YES	<p>The modifications to para. 7.18 provide clarification as to the purpose of the Biodiversity Opportunity Areas (BOAs) as opportunity areas for restoration and creation of BAP habitats. This includes the Deciduous Woodland Habitat Action Plan (HAP) targets where appropriate. It was acknowledged by the Council at the EIP that the BOAs were not an impediment to urban development, but that such development where justified would need to conserve existing Priority Habitats and provide some biodiversity gain through site-specific measures.</p> <p>The Modification is considered to be sound in that it is consistent with national planning policy contained in the NPPF and Planning Practice Guidance.</p>	No change to para. 7.18	NO
REP/025	Ifield Village Conservation Area Advisory Committee	Section 7 on Environment and ENV3	NC	NC	<p>This is a response from Ifield Village Conservation Area Advisory Committee to the Modifications of the Local Plan. We have looked at section 4 on Character and section 7 on Environment of the modified plan, as these relate to our remit of conserving and enhancing a conservation area. We are in agreement with the changes that have been made and continue with our support of the proposal for a Local Green Space in the southern section of Ifield Brook Meadows (ENV3).</p>		NC
REP/101	Sussex Wildlife Trust	MM33 Policy ENV4	NC	NC	<p>The Trust is concerned that the last sentence of the modification to Policy ENV4 is ambiguous. We suggest it is amended to 'Applicants must also ensure that the proposal adheres to other environmental policies in the Plan and considers the character of the site'.</p>		NC

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/055	Mr Richard Bucknall Mr Tony Fullwood	MM33 ENV4	YES	NO	<p>ENV4 An inaccuracy was acknowledged at the Examination in identifying Land East of Balcombe Road/ Street Hill and surrounding land as publically accessible natural green space to which Policy ENV4 would apply. Policy ENV4 applies to land which is publically accessible and states: Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless: a) An assessment of the needs for open space, sport and recreation clearly show the site to be surplus to requirements; or b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>Land East of Balcombe Road/ Street Hill and surrounding land is privately owned and does not permit public access. The land is not a partly or wholly accessible public open space and there are no statutory Rights of Way or permissive codes allowing the public to enter these sites. This area is not accessible to the public and cannot be counted towards the quantitative provision of this type of open space. The modification <i>Replace Open Space Typology Plan with updated version below</i> does not correct the factual inaccuracy.</p> <p>Without the deletion of the 'H'-shaped Land East of Street Hill and surrounding land as Natural Green Space from the Modified Plan, the development of the Modified H2 housing allocation at Land east of Balcombe Road/Street Hill would be inappropriately expected to comply with the criteria of Policy ENV4. This may make the allocation of this suitable site undeliverable.</p> <p>The designation on the Modified Open Space Typology Plan is not justified as it does not represent the most appropriate</p>	Delete of the 'H'-shaped Natural Green Space from Land East of Street Hill and surrounding land from the Modified Open Space Typology Plan	YES

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					strategy, when considered against the reasonable alternatives, and is not based on robust evidence. The designation of Land East of Balcombe Road/Street Hill and surrounding land means that the housing allocation would need to comply with Policy ENV4 and may result in the housing allocation not being deliverable. The Modified Open Space Typology Plan means that this part of the plan is not positively prepared based on a strategy which seeks to meet objectively assessed housing need as soon as possible.		
REP/050	Persimmon Homes and Taylor Wimpey Pegasus Planning	MM34 Policy ENV6- Sustainable Design and Construction	NC	NC	<p>We note that MM34 deletes the policy requirement for new development to achieve Code for Sustainable Homes Level 3. This is considered to be an appropriate response to the conclusions of the <i>Housing Standards Review</i>.</p> <p>ENV6 however retains a set of Sustainability Objectives which all new developments should "consider" how such objective will be achieved. The retention of such objectives is not supported as it is not the function of Local Plans to dictate how carbon reduction will be achieved. The DCLG statement of July 2014 ('Next steps to zero carbon homes-Allowable Solutions') is clear that house builders will be able to decide how carbon reduction measures are implemented, it is not the role or purpose of Local Plans to prescribe the manner by which developers achieve such objectives.</p> <p>Policies within Local Plans should be precise and form an appropriate basis upon which to determine appropriateness of proposals for development. Not only are the objectives contrary to national policy, if such objectives were retained they would not amount to policy in any event as development proposals are only required to 'consider' how such objectives could be met. It remains our position that ENV6 is an unnecessary policy and should be deleted.</p>		NC

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>Moreover, this policy remains contradictory as explained in the hearing sessions. Policy ENV6 also requires all new development to submit a Sustainability Statement to demonstrate how the sustainability objectives have been 'achieved'. This is inconsistent with the requirement for such objectives to be <i>considered</i> and effectively elevates the objectives to a specific policy requirement upon which an application for development can be refused.</p> <p>This requirement seeks to impose prescriptive measures which is well beyond the remit of such policy and contrary to the established principle that it is for developers to determine how best carbon reduction measures can be implement as part of the development.</p>		
REP/050	Persimmon Homes and Taylor Wimpey Pegasus Planning	MM35 Policy ENV7-District Energy Networks	NC	NC	<p>We note that the policy is now drafted with the intent that it merely requires developers to consider connection to District Energy Networks and other elements of the hierarchy. However, it would seem that the policy would require the developer to demonstrate through a Sustainability Statement why the objectives cannot be achieved through District Energy Networks with reference to viability or alternative solutions that would be "<u>more</u>" carbon efficient. This approach is not supported as it is designed to dictate how carbon reduction measures can be provided, with schemes that do not deliver the objectives for District Energy Networks, either as a result of viability of technical feasibility, subject to more onerous policy requirements than would otherwise be sought.</p> <p>As noted above we consider that the Government has given clear indication that the developer should have the flexibility and right to choose how it deals with carbon reductions. This policy seeks to guide developers down a particular route that they may not wish to go down for whatever reason. Furthermore it</p>		NC

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>appears to require alternative solutions to be more carbon efficient. Surely there can be no justification to require alternatives to achieve a higher benchmark, otherwise this again seeks to force developers into District Energy Networks.</p> <p>If the intention of the policy is to simply encourage developers to consider District Energy networks then it has no robust foundation in terms of a measureable and defined policy provision that can be applied in the determination of a planning application. Our greater concern is that it is beyond the scope of Local Plan policies to dictate how low carbon development can be achieved (only allowing alternatives if the developer demonstrates a viability issue or greater carbon savings through alternative means) when the Government advocates choice. We consider that the policy is unnecessary and contrary to Government Guidance and should therefore be deleted.</p>		
REP/023	Environment Agency	AM118 Policy ENV8 Development and Flood Risk	NC	NC	We support the proposed modifications. The amended paragraph clearly states the nature and scale of the risk to flooding from a number of sources in Crawley and sets out the importance of development being built with flood risk fully considered.		NC
REP/023	Environment Agency	MM36 Policy ENV8 Development and Flood Risk	NC	NC	<p>We support the proposed modification. Crawley is known to be at risk to flooding from a number of sources, including from surface water. It is highly important that surface water runoff rates are fully considered and carefully managed as part of the development process.</p> <p>We look forward to being consulted on the Planning and Climate Change SPD in due course and we welcome the production of this supplementary document.</p>		NC

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/023	Environment Agency	AM119 Policy ENV8 Development and Flood Risk	NC	NC	We support the proposed modifications. This amendments sets out the engagement process with other Authorities who play a part in managing flood risk.		NC
REP/023	Environment Agency	AM120 Policy ENV8 Development and Flood Risk	NC	NC	We support the proposed modifications for clarity purposes		NC
REP/023	Environment Agency	AM121 Policy ENV8 Development and Flood Risk	NC	NC	We support the proposed modifications as the amendment better reflects the current position regarding the SuDS Approval Body.		NC
REP/023	Environment Agency	AM122 Policy ENV8 Development and Flood Risk	NC	NC	We support the proposed modifications. It is essential to ensure that the Flood Zone Plan reflects the latest version of this information.		NC
REP/023	Environment Agency	Policy ENV9	NC	NC	<p>We support the main modifications to this policy.</p> <p>The Sustainability Appraisal on p54 contains a reference to Water Resources Management Plan 2010-2035 (Southern Water, October 2009). That should be 2015-2040 and October 2014.</p> <p>For the Gatwick area and the far north of the borough, the Final Water Resources Management Plan 2010-2040 (Sutton and East Surrey Water, June 2014) is also relevant.</p>		NC

Rep No.	Respondent	Mod Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					The southeast of the borough is also affected by the Water Resources Management Plan 2010-2040 (South East Water, June 2014)		
REP/027	Gatwick Airport	MM38 Policy ENV11: Development and Noise	NC	NC	GAL supports the proposed modifications		NC
REP/002	Day Group Ltd., Aggregate Industries UK Ltd and CEMEX UK Operations Ltd Firstplan	MM38 Policy ENV11	NC	NC	<p>MM38 – Policy ENV11: Our client's support the proposed modifications ENV11 which now includes additional text under the 'Noise Sensitive Development' section to include the consideration of industrial noise on proposed development; and requires the development to show appropriate mitigation including careful planning, layout and design. Proposals that would expose future users of the development to unacceptable noise levels will not be permitted.</p> <p>Without this modification the Policy would be considered unsound as set out in our previous representations.</p> <p>In summary, our client's support the proposed modifications to the Crawley Local Plan.</p> <p>However, we still have concerns about the proposed Tinsley Lane site and the potential for future conflicts with the Goods yard</p>		NC

Chapter 8: Infrastructure

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/012	BUPA Care Mr Andy Stallan	Policy IN1	NC	NC	We support the modifications proposed to Policy IN1 on the basis of our previous representations both in writing (on 24 April) and verbally at the Examination Hearings.		NC
REP/029	Highways England	Transport Strategy	NC	NC	<p>The Crawley Borough Local Plan 2015-2030- Modifications Consultation Draft June 2015</p> <p>Thank you for inviting Highways England to comment on the Crawley Borough Local Plan 2015-2030- Modifications Consultation Draft June 2015.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We provided a statement of common ground regarding the transport strategy of the Local Plan in April 2015, it stated that we</p>		NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>had one outstanding issue "Highways England requires assurances that demonstrate the availability and security of funding for the required mitigation at M23 Junction 9." As the modification draft does not address this outstanding issue we would like to reiterate our need for this assurance.</p> <p>We do not have any further comments,</p>		
REP/066	Thames Water	MM39 Policy IN1: Infrastructure Provision	NC	NC	<p>Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water in relation to their statutory undertakings.</p> <p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough and are hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Our comments on behalf of Thames Water are set out below:</p> <p><u>Proposed Change MM39 - Policy IN1: Infrastructure Provision</u></p> <p>Thames Water support the policy in principle, but as previously indicated consider that a specific policy text is required in the new Local Plan in relation to water and wastewater/sewerage infrastructure to guide developers.</p> <p>New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater...."</p>	<p>Thames Water consider that the Local Plan should include <u>specific policy text</u> covering the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).</p> <p>Such a policy is required to ensure the infrastructure is provided in time to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated</p>	NC

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p>Paragraph 162 of the NPPF relates to infrastructure and states: <i>“Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</i></p> <p>Part 9 of the revoked South East Plan related to Natural Resource Management and included a separate section on Sustainable Water Resources and Water Quality Management. Policy NRM1 related to Sustainable</p> <p>Water Resources and listed a number of water supply infrastructure issues which local authorities should take into account in preparing Local Development Documents including ensuring that development is directed <i>“....to areas where adequate water supply can be provided from existing and potential water supply infrastructure. In addition ensure, where appropriate, that development is phased to allow time for the relevant water infrastructure to be put in place in areas where it is currently lacking but is essential for the development to happen.”</i> Policy NRM2 related to Water Quality and listed a number of water quality/sewerage infrastructure issues which local authorities should take into account in preparing Local Development Documents including ensuring that: <i>“....adequate</i></p>	<p>low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of “soundness” for Local Plans.</p> <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:</p> <p>Proposed Water/Wastewater Infrastructure Policy:</p> <p>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. 	

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					<p><i>wastewater and sewerage capacity is provided to meet planned demand...".</i></p>	<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.</p> <p>The development or expansion of water supply or waste water facilities will normally be permitted, 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</p>	

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
						<p>capacity to serve all new developments. 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. 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</p>	

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
						<p>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 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.</p> <p>We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.</p>	
REP/072	Wilky Group Savills Simon Fife	MM39 p.108 Policy IN1	YES	YES	<p>The modifications to Policy IN1 result in a more reasonable approach to assessing the effects of development on infrastructure in that it takes account of mitigation; requires an assessment in terms of cumulative effects, and requires that alternative provision be taken into account. This is consistent with the approach that should be taken in any planning application or through EIA.</p> <p>The Modification is considered to be sound in that it is consistent with national planning policy contained in the NPPF and Planning Practice Guidance.</p>	No change to Policy IN1.	NO

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/069	Theatres Trust	Policy IN1 MM39	YES	YES	The Theatres Trust supports the proposed changes as they generally reflect Item 70 of the NPPF, however, to strengthen the proposed changes to IN1, we recommend the following modifications noted in capitals: Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless an equivalent replacement or improvement to services is provided ON SITE OR WITHIN THE VICINITY or there is sufficient alternative provision in the VICINITY.		NO

Chapter 9: Gatwick Airport

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP /072	Wilky Group	MM40 p.117 Policy GAT2	Yes	YES	<p>The modification to Policy GAT2 provides clarification that some development may be permitted within the Safeguarded Land on a temporary basis, so acknowledging that some development may not prejudice the future provision of a second runway because it is only permitted on a temporary basis, Such development / uses could be terminated by a refusal to grant a further planning permission (or vary a condition) at the end of the temporary period so as to allow the second runway project to proceed.</p> <p>The Modification is considered to be sound in that it is consistent with national planning policy contained in the NPPF and aims to minimise planning blight affecting the Safeguarded Land.</p>	No change to Policy GAT2. N	NO
REP /027	Gatwick Airport	MM40 GAT2: Safeguarded Land			<p>GAL does not support the proposed policy modification addition of the words <i>'where appropriate, planning permission may be granted on a temporary basis'</i>.</p> <p>With the exception of minor development GAL considers that development which is which is incompatible with the future expansion of the airport should not be permitted in the safeguarded area on a permanent or, other than by exception, a temporary basis.</p> <p>The 'Safeguarded Area' comprises land which is retained and safeguarded as directed by National Aviation Planning Policy in order to facilitate the future delivery of a significant infrastructure project that will be in the national interest.</p> <p>Permitting some forms of incompatible development even on a temporary basis could give rise to greater development in the</p>	<p>We suggest the policy should be reworded as follows:</p> <p><i>Safeguarding for a second runway</i> <i>The Local Plan Map identifies land which will be safeguarded from any development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport.</i></p> <p><i>Minor development within this area, such as changes of use and small scale</i></p>	NO

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
					safeguarded area, which may subsequently prove difficult to cease and which risks adding further complexity and cost to a future planning process for securing development consent, and for the timing of the delivery of nationally essential infrastructure. There should therefore be a presumption in the safeguarded area of not permitting any development (whether permanent or temporary) which could be incompatible with the future 2 nd runway development.	<i>building works, such as residential extensions will normally be acceptable. Where appropriate, planning permission may be granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area.</i>	

Local Plan Noise Annex

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/027	Gatwick Airport	MM44 Local Plan Noise Annex	NC	NC	GAL supports the proposed modifications		NC

Glossary

Rep No.	Respondent	Modification Number/ Policy	Legally Compliant	Sound	Comments	Modifications	Hearing
REP/069	The Theatres Trust	AM166 Glossary	YES	YES	We support the modifications to 'Infrastructure' as it provides clarification and reflects Item 70 of the NPPF in relation to Policy IN1.		NC