

# CRAWLEY BOROUGH COUNCIL

## GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT

### REGULATION 12 CONSULTATION STATEMENT

OCTOBER 2016

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#### **1. Introduction**

- 1.1. This Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, and 'Getting Involved', Crawley Borough Council's Statement of Community Involvement (SCI). It also has regard to the requirements of the National Planning Policy Framework (2012).
- 1.2. Regulation 12 of the Local Planning Regulations requires that before a local planning authority adopts a Supplementary Planning Document (SPD) it must prepare a statement identifying the persons who have been consulted in the preparation of the document, the main issues raised by them, and the manner in which these have been addressed. The present document is that statement. An earlier version was made available alongside the SPD for the purpose of seeking representations as part of a public consultation and has been updated accordingly.
- 1.3. 'Getting involved ... in planning', an appendix to the council's SCI requires that local planning documents be subject to a period of 'early engagement' prior to formal consultation, providing opportunities for interested stakeholders and individuals to feed into the preparation of the document. In setting out the details required by Regulation 12 as mentioned above, this document provides a summary of the 'early engagement' process and the formal consultation.

#### **2. Involve: Stage 1 – early engagement**

- 2.1. Early in October 2015, the council contacted all those parties who had previously asked to be kept informed about the progress of the Crawley Borough Local Plan<sup>1</sup>, highlighting the fact that the council proposed to produce a group of SPDs across a range of identified topics, including green infrastructure. Those contacted were invited to sign up for further updates in relation to particular topics, and directed to a page on the council's website providing further information about the function of the SPDs and their proposed scope. The web page also invited interested parties to respond to nine broad questions about their coverage and approach.
- 2.2. Alongside this engagement with contacts from the council's Local Plan database, invitation was sent to members of the council to express their interest in particular SPDs. The SPDs and the associated web page were also publicised via the council's main web page.
- 2.3. In response to these communications a number of parties, including external stakeholders and council members, confirmed their desire to be kept up to date with progress with the SPDs, including the Green Infrastructure SPD. Two respondents provided some limited feedback at this early stage, and a

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<sup>1</sup> See Appendix A for details of the materials used as part of the general Early Engagement consultation.

further response was submitted alongside the recent public consultation on the Urban Design and Climate Change SPDs. These comments were taken into account during the drafting of the consultation Green Infrastructure SPD.

- 2.4. On 20 January 2016, a seminar was held for council members at which the proposed focus and approach of each SPD currently being worked on was summarised, and questions and comments were invited. Members drew attention to the importance of care and management of landscaping, the need to replace lost trees adequately and seeking open space improvements where there are deficits and increased population putting pressure on local facilities.
- 2.5. Concurrently with these engagement exercises, a number of internal and external stakeholders were invited to provide comment on individual SPDs where the council considered that their expertise would be particularly valuable in the early drafting work. Responses were incorporated into the consultation draft SPD.

### **3. Consult: Stage 2 - publication**

- 3.1. A formal stage of public consultation was undertaken on a draft version of the Green Infrastructure SPD. The draft document was made available for representations over a four week period between Monday 16 May and Monday 13 June. This consultation was undertaken in accordance with Regulation 12.(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and 'Getting involved... in planning', the appendix to the council's Statement of Community Involvement.
- 3.2. All consultees included on the council's Local Plan consultee database were emailed or written to with notification of the commencement of the consultation. A further reminder email was circulated highlighting the close of consultation date. The consultation materials are set out in Appendix B of this consultation statement.
- 3.3. During the consultation period, the draft Green Infrastructure SPD was available to view online at [www.crawley.gov.uk/crawley2030](http://www.crawley.gov.uk/crawley2030). Paper copies of the documents were available at the following locations during normal office hours:
  - Town Hall
  - Crawley Library
  - Broadfield Library
- 3.4. The SPD included a number of specific questions to aid the consultation process. These were set out within the document, both throughout at the end of each chapter and together at the end of the document for reference. They are replicated in Appendix B of this consultation statement. Responses did not have to be restricted to answering the questions, and comments were welcomed on any part or aspect of the draft SPD.

#### Representations Received

- 3.5. Representations had to be provided in writing. This could be done either by emailing the Forward Planning team or by post. Representations received during the consultation period are set out in tabular form in Appendix C. The council's response to the comments received are provided in the same table; this includes reference to where the representation received have led to changes in the final SPD.

## **APPENDIX A: EARLY ENGAGEMENT MATERIALS**

### **1. GENERAL CONSULTATION QUESTIONS**

The following questions are being asked to feed into the early stages of scoping the SPDs:

**Q1:** Do the topics identified cover the main areas requiring additional guidance?

**Q2:** Are any of the topics considered unnecessary?

**Q3:** Are there any additional topics which haven't been identified as a Supplementary Planning Document which the council should consider?

**Q4:** Are the policies identified to be covered by the SPDs appropriate?

**Q5:** Should any of the policies be addressed in a different SPD to that identified in the table?

**Q6:** Should policies only be covered by one SPD rather than considered by each relevant topic area?

**Q7:** Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) that haven't been identified which should be considered for inclusion in one of the SPDs?

**Q8:** Should the SPDs focus solely on statutory planning policy guidance or should they provide best practice examples and to provide advice and suggestions beyond the remit of planning policy, within the topic area?

**Q9:** Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage?

Further detailed questions will be asked relating to each of the topic areas in due course.

## 2. EARLY ENGAGEMENT EMAIL TO LOCAL PLAN CONSULTEE DATABASE

# LOCAL PLAN UPDATE

2 October 2016



Dear ,

You have previously indicated an interest in being involved in the preparation of the Crawley Borough Local Plan 2015 – 2030: Crawley 2030. As you are aware the Local Plan is now in its advanced stages, having been considered through a series of Examination Hearing sessions held earlier this year. The council is now awaiting the Planning Inspector's final report.

This email seeks to draw your attention to the work the council are now commencing on to support the Local Plan once it is adopted as the borough's primary Planning Policy.

To aid the interpretation and implementation of some of the Policies within the Local Plan, a number of Supplementary Planning Documents (SPDs) are currently being considered for early preparation. These are proposed to cover the following topic areas:

- Affordable Housing
- Climate Change
- Design
- Green Infrastructure
- Planning Obligations
- Town Centre

A period of early engagement is currently being undertaken from October to December 2015, with a number of general questions being asked in relation to these documents which we welcome your views on. The council's webpage [www.crawley.gov.uk/crawley2030SPD](http://www.crawley.gov.uk/crawley2030SPD) provides more information.

If you are interested in being kept informed in any of the above topics, please could you contact the Forward Planning team and indicate which of the SPDs you are interested in. You are welcome to be involved and informed about any number of these, from one to all. The contact database for each will be kept separately to the others and the Local Plan.

Kind Regards,

The Forward Planning Team

### More information

For more information, please visit our website [www.crawley.gov.uk/crawley2030](http://www.crawley.gov.uk/crawley2030) where you can find details of the Local Plan and preparation of the new Supplementary Planning Documents.

**Contact us**

If you would like to contact the Forward Planning Team, please email us at [forward.plans@ Crawley.gov.uk](mailto:forward.plans@ Crawley.gov.uk) or you can phone us on 01293 428624.

**Subscribe/unsubscribe**

You have received this message as you have expressed an interest in being kept up-to-date with progress on Crawley's Local Plan. If you would not like to receive these updates any more, please respond to this email and let us know. If you know anyone that would like to receive these updates please ask them to email us at [forward.plans@ Crawley.gov.uk](mailto:forward.plans@ Crawley.gov.uk)

### 3. EARLY ENGAGEMENT LETTER TO LOCAL PLAN CONSULTEE DATABASE

#### Strategic Housing & Planning Services

Contact: Elizabeth Brigden

Date: 09/10/2015

Direct Line: 01293 438624

Email: [Forward.Plans@crawley.gov.uk](mailto:Forward.Plans@crawley.gov.uk)



Lee Harris  
Chief Executive Directorate

Dear Sir or Madam,

You have previously indicated an interest in being involved in the preparation of the Crawley Borough Local Plan 2015 – 2030: Crawley 2030. As you are aware the Local Plan is now in its advanced stages, having been considered through a series of Examination Hearing sessions held earlier this year. The council is now awaiting the Planning Inspector's final report.

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If you are interested in being kept informed in any of the above topics, please could you contact the Forward Planning team by email at [Forward.Plans@crawley.gov.uk](mailto:Forward.Plans@crawley.gov.uk) or phone 01293 438624 and indicate which of the SPDs you are interested in. You are welcome to be involved and informed about any number of these, from one to all. The contact database for each will be kept separately to the others and the Local Plan.

Yours Faithfully,

A handwritten signature in black ink, appearing to read "Elizabeth Brigden".

Elizabeth Brigden  
Planning Policy Manager

#### 4. SPECIFIC AND GENERAL CONSULTEES

Addaction  
Afro Caribbean Association (ACA)  
Age Concern West Sussex  
Ahmadiyya Muslim Association UK (Crawley Branch)  
Alternative Learning Community Bewbush  
AMEC Environment & Infrastructure  
BAPS Swaminarayan Santha  
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  
Charwood Parish Council  
Churches Together in West Crawley  
Colgate Parish Council  
COPE  
County Mall  
Crawley Bangladeshi Welfare Association  
Crawley Baptist Church  
Crawley Campaign Against Racism  
Crawley Clinical Commissioning Group  
Crawley Community Relations Forum  
Crawley Community Transport  
Crawley Community Voluntary Service  
Crawley Educational Institute  
Crawley Ethnic Minority Partnership  
Crawley Festival Committee  
Crawley Homelessness Forum  
Crawley Homes in Partnership (CHiP)  
Crawley Interfaith Network  
Crawley International Mela Association (CIMA)  
Crawley Kashmiri Women's Welfare Association  
Crawley Mosque  
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  
Deloittes  
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 Cttee  
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  
Home Builders Federation Ltd  
Housing & Planning Directorate  
Housing 21  
Hunter Page Planning Ltd  
Hyde Housing Association  
Iceni  
Ifield Park Care Home  
Ifield Village Conservation Area Advisory Committee  
Ikra Women & Children Learning Centre  
Inspire Broadfield (youth group)  
Ismaili Council  
Iyad Daoud  
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  
Manor Royal Business Group  
Michael Simkins LLP  
Millat-e-Jafferyyah (Shia Muslim Mosque)  
MITIE Property Services Limited  
Moat Housing  
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  
Persimmon Homes

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  
 Southgate Conservation Area Committee  
 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 Traveller Action Group  
 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 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  
 Metrobus

Reside Developments Ltd.  
 Savills  
 Land Planning & Development  
 DevPlan  
 JWL Associates Limited  
 HCA  
 Deloitte  
 Arora International  
 Development Securities  
 Moat Telford Place  
 Crawley Clinical Commissioning Group  
 Adur & Worthing  
 Brighton & Hove City Council  
 British Telecom  
 BT Plc  
 Chichester District Council  
 Coast to Capital LEP  
 Epsom & Ewell Borough Council  
 English Heritage  
 Environment Agency  
 Highways England  
 Homes and Communities Agency  
 Horsham District Council  
 Lewes District Council  
 Marine Management Organisation  
 Mid Sussex District Council  
 Mole Valley District Council  
 National Grid  
 Natural England  
 Network Rail  
 NHS Sussex  
 Reigate and Banstead Borough Council  
 South Downs National Park  
 Southern Gas Network  
 Southern Water  
 South East Water  
 Surrey County Council  
 Sussex Police  
 Tandridge District Council  
 Thames Water  
 The Coal Authority  
 UK Power Networks  
 Waverley District Council  
 West Sussex County Council  
 Worthing Borough Council  
 West Sussex County Council  
 West Sussex Fire and Rescue Service  
 Guildford District Council  
 National Landlords Association  
 Sport England  
 Travis Perkins  
 Deloitte  
 Dev Plan UK  
 DPDS Planning  
 Indigo Planning  
 AMEC Foster Wheeler  
 WYG Planning  
 WYG Planning  
 Holiday Extras  
 Sussex Wildlife Trust  
 Sussex Gardens Trust  
 Historic England  
 Quod Mayfield Market  
 Tetlow King  
 Gatwick Area Conservation Campaign  
 Stratus Environmental



Zoe Elphick  
Miss Z Read  
Yvonne Lindsay  
Sean  
Yvonne Shaw  
Yeshwant Patel  
Yasmin Church  
Y Bosseva  
Rosa Pereira  
Miss R Nieman  
Wendy Bell  
Wendy Whittington  
W Chorley  
Stephen Hayes  
Wendy Plaistow  
Mr & Mrs Bennett  
Z Wilson  
Brian Wilkinson  
Paul West  
Michael-Thor Bateman  
Wesley Brazier  
Wes Botting  
Mrs WJ Paton  
W Lovell  
Ann Pile  
Vivienne Dawson  
Vishal Mathur  
Vikki-Jade Peters  
Vidita Shah  
Victoria Martin  
Vicky Langham  
Victoria Beach  
Vicki Wallage  
Vicki Mills  
Vicky Nixon  
Vicki Clare  
Verity Eunson-Hickey  
Paul Owen  
Veronika Novotna  
Verity Colbert  
Katie Vella  
Iryna Varvanina  
Mr Vaidya  
Mr R S Upton  
Patricia Upham-Hill  
Charles Jones  
T Pawlak  
M Wright  
Miss Tracy Poynter  
Tracey Gillett  
Tracy Jones  
Tracy Clarke  
Tracey Wesson  
Tracey Leicester  
Tracey Coleman  
Tony Sutton  
Tony Fullwood  
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  
Morgan O'Flanagan  
Clare Loader  
M B Lanham  
Mrs Jenny Lakeman  
Roy Howard  
Lynn Howard  
Karen Tankard-Fuller  
Timothy Caig  
Amanda Whale  
Kim Gordon  
Mrs Teresa Perrott  
Terry Beavis  
Mr Terry Wheller  
Jake Hawkins  
Chay Sharp  
David Sharp  
Ellice Sharp  
Patricia Sharp  
Tom Doyle  
Terry Stanley  
Tracey Bennett  
Tara Petty  
Tanya Bunn  
Tanya Sladovich  
Tadeusz Jasko  
T Pool  
Tracey Cox  
Sylvia Handy  
Angela Heath  
Mrs Siyar  
Suzanne Davies  
Mrs S Knight  
Suzannah Guy  
Susan Lester  
Susan Smyth  
Sue Carraher  
Sue Arnold  
Sunita Singal  
Sumra Ahmed  
Sumi Patel  
Sue Mason  
Miss Susan King  
Sue Janota  
Natacha Wilson  
Karla Strudwick  
Sarah Dowdall  
Sandra Foxton  
Stewart Neate  
Stevin  
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  
Sophie Airey

Sophie Harding  
Colin Snook  
Dawn O'Dwyer  
Sophie Eaton  
Sam Bouglas  
Sharon Richardson  
Sarah-Jane Willis  
Siobhan Miller  
Claire Collins  
Doreen Simpson  
Simon Thrift  
Joan Thrift  
Simon Freeman  
Simon Douglas  
Simon Randall  
Simon Hickey  
Simon Burrows  
Simon Biffen  
Sim Sidhu  
S.Newbury  
Sherwin Scott  
Michelle Holmes  
Darren Williams  
Shelley Williams  
Malcolm Woodhead  
Sheila Woodhead  
Shazia Ahmed  
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Sharon Ottley  
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Sharon Terry  
Leandro Correa  
Sharon Correa  
Sharon Brumwell  
Sharon Vygus  
Mrs S Veaney  
Sharon Harris  
Ms L Flay  
Mrs Harrington  
Alison Shackell  
S. Garvin  
Serene Cottee  
Mrs S E Cooke  
Sean Reynolds  
Steven Woods  
Zoe Grimshaw  
Amanda Bounds  
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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

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Russell Sharp	Samantha Thomas	Niall Nugent
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Rukiya Maxwell	Jenny Willis	Netta Bond
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Kay Stannard	Philippa Mitchell	Mr Nathan Spriggs
Ross Margetts	Rex Upham-Hill	Natalie Chambers
Rosie Cavedaschi	Petty West	Natalie Zevka
Ros February	Graham Petschel	Mrs Natalie Moran
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Robert Rolfe	Jean Goodrich	Laura Randall
Robert MacPherson	Joanne Brown	Terry
Roberta Page	Peter Burrows	Moustapha Kada
Robert Bruins	Mary Burrows	Mrs Janette Thompson
Robert Bird	Emily Johnson	Linda Keynes
Robin Vallins	Paul Oliver	Wayne Bonner
Yvonne Vallins	Paul Brown	Kara Bonner
Rob Pullinger	Pauline February	Amanda Madel
Thomas Pullinger	Paul Hughes	Harry Madel
Vicky Pullinger	Paul Davis	Trevor Madel
Robert Paliotta	Paul Berry	Samantha Wood
Rik February	Paul Miller	Mrs Sue Bristow
Richard Thorburn	Paula Hanslow	Margaret San Juan Martin
Richard Symonds	Paul Roberts	Shani Wheatley
Richard Nixon	Paul Harrison	Molly Rumble
Rhys Whittle	Patricia Patel	Morag Warrack
Rhonda Dann	V Patel	Mohsin Ahmed
Sophie Warren	Mrs P Godwin	Mr M Richardson
Benson Kalubi	Alexander Curtis	Mr Martin Saunders
Rhoda James	Pat Crees	Jonathan Mitchell
Rachel Hillman	Simon Pashley	Paul Lewis
Reuben Peters	Nick Pashley	Michael Petryszn
Aurora Lula	Mr P Akhtar	Mike Parker
Remo Lula	Parmjit Sidhu	Michael Eaton
Aaron Squirrell	Peter Parker	Michael Simmonds
Maretta Rees	Pam James	Mike Doyle
Reece Church	Sarah Page	Maria Lula-Harris
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Rebecca Holt	Mandy Wilkinson	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 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  
Sir / Madam  
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  
Louise Golding  
L Haynes

Lisa Burton  
Charlotte Cox  
Lauren O'Sullivan  
Lorraine Pateman  
Lorraine Graham  
Susan Johnson  
David Thrift  
Lois Thrift  
Sir / Madam  
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  
Master Liam Spriggs  
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  
Sir / Madam  
Lauren Judge  
Laura Virgo  
Laura Fraser  
Laura Irvine  
Laura Marden  
Laura Hamilton  
Ms Charlotte Latimer  
Pauline  
Alena Hobson  
Donna Botting  
Jayden van de Lagemaat-  
Bettinson  
Andre van de Lagemaat  
P Wheeler  
Kyle Fish  
Jakub Jasko  
Kate Townner  
Karen & Phil Smith  
Phil Smith  
Kim Piercey  
Peet Boxall

Kate Nulty  
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  
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Mrs Claire Carroll  
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Ciaran Barron  
Kieran Faulkner  
Chris Bower  
Sir / Madam  
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Christine Christensen  
Chris Spurgeon  
Chris Shelford  
Cheryl Jones  
Cheryl Brown  
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Mr S Chart  
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Brian Eastman  
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Brenda Holman  
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Alex Petryszyn  
A and P Smith  
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# 5. CRAWLEY BOROUGH COUNCIL CRAWLEY 2030 SUPPLEMENTARY PLANNING DOCUMENT WEBPAGE



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### Crawley 2030: Supplementary Planning Documents

Crawley Borough Council is commencing work on a number of Supplementary Planning Documents (SPDs) to expand upon the policies established by the Crawley Borough Local Plan 2015 — 2030: Crawley 2030.

#### Topic Areas

The SPDs will not make new planning policy, but will aid the interpretation and implementation of the new Crawley Local Plan once it is adopted as the council's primary Planning Policy document. The topic areas being considered for SPDs are:

- Affordable Housing
- Climate Change
- Design
- Green Infrastructure
- Planning Obligations
- Town Centre

These SPDs will eventually replace the existing suite of supplementary planning guidance notes and some of the other SPDs. Manor Royal SPD and Design Guide will remain a council adopted document, as will Development of Gatwick Airport SPD.

The extent to which the SPDs provide guidance and expansion of the Local Plan policies will vary and will depend upon whether it is concluded that additional information adds value, beyond that which is already provided.

Some of the Policies are currently proposed to be covered by more than one SPD, the information will not be repeated and will only be in the most relevant SPD to the principle behind the policy objective. However, it is acknowledged that there will have to be clear cross-referencing to ensure there is no confusion caused, duplication, inconsistency or omissions.

#### Who are they for?

The SPDs will be aimed at individuals and companies who wish to make a successful planning application. This will include:

- Householders
- Businesses
- Landowners

#### Why do we need SPDs?

The SPDs will seek to provide guidance for applicants to meet the policy requirements set by the Local Plan, and offer information as to what is expected at each of the key stages relating to the making of a planning application:

- Pre-application;
- Submission & validation;
- Planning application;
- Post-planning permission.

Where relevant, the SPDs will clarify what is required for the following types of planning application:

- Householder
- Change of Use
- Residential Development
- Non-Residential Development
- Shop Fronts
- Advertisement Consents

#### Involvement and Engagement

If you are interested in being involved and kept informed on the progress of the SPDs please contact [Forward Planning](#) with your name and contact details, along with the topic area, or areas, you are interested in. You are welcome to be engaged in as many or as few of the SPDs as you would wish to be.

We welcome your views on the following questions.

## In This Section:

- [Planning and Development](#)
- [Planning Policy](#)
- [Local Plan - Crawley 2030](#)
- [Crawley 2030: Supplementary Planning Documents](#)

## Contact Us

tel: (01293) 438512

fax: (01293) 438495

email: [click to contact us](#)

address  
Strategic Planning  
Town Hall  
The Boulevard  
Crawley  
W.Sussex RH10 1UZ



#### General Consultation Questions

**Q1:** Do the topics identified cover the main areas requiring additional guidance?

**Q2:** Are any of the topics considered unnecessary?

**Q3:** Are there any additional topics which haven't been identified as a Supplementary Planning Document which the council should consider?

**Q4:** Are the policies identified to be covered by the SPDs appropriate?

**Q5:** Should any of the policies be addressed in a different SPD to that identified in the table?

**Q6:** Should policies only be covered by one SPD rather than considered by each relevant topic area?

**Q7:** Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) that haven't been identified which should be considered for inclusion in one of the SPDs?

**Q8:** Should the SPDs focus solely on statutory planning policy guidance or should they offer best practice examples and be used to provide advice and suggestions beyond the remit of planning policy, within the topic area?

**Q9:** Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage?

Further detailed questions will be asked relating to each of the topic areas in due course.

#### Next Steps

The Local Plan policies remain subject to modification depending on the outcome of the Planning Inspector's final report into the Crawley Borough Local Plan.

Consultation on the draft SPDs will take place following the receipt of this, and after the Local Plan has been formally adopted by the council by way of a resolution at its Full Council meeting. This is currently anticipated to allow for public consultation on the SPDs to be undertaken early in the New Year (2016).



## **APPENDIX B: STATUTORY CONSULTATION MATERIALS**

### **1. GREEN INFRASTRUCTURE SPD CONSULTATION QUESTIONS**

1. Are there any other issues or areas of the policy that need further clarification and do you have any further suggestions to help applicants meet the requirements of Local plan Policies covered in this SPD?
2. Please let us know if you have any examples (including photos) in Crawley which show good green infrastructure planning.

#### **Part 2: The Green Infrastructure Network**

3. Does the GI map fully reflect the green infrastructure assets and general opportunities present in Crawley? If not, how could this be improved?
4. Is the guidance on how applicants should consider green infrastructure clear?
5. Are the green assets and opportunities to deliver benefits sufficiently covered?
6. Is the guidance on landscaping and maintenance helpful to applicants?
7. Does the guidance enable proposals impacting structural landscaping to adequately assess the impacts?
8. Does the rights of way section highlight the key issues for applicants to consider?
9. Are you aware of any other opportunities for enhancing the rights of way network?

#### **Part 3: Trees**

10. Is the guidance for provision of one tree per new dwelling and on tree replacement standards clear?
11. Are there any other considerations in the type and location of new and replacement tree planting?
12. Are there any issues we have not covered which you would like to draw our attention to?

#### **Part 4: Open Space**

13. Does this section clearly set out what is required to mitigate the impacts of new development on open space and the process for determining proposals on open space?
14. Should there be further guidance from the council on what an applicant would need to assess to determine whether an open space is surplus to requirements?
15. Is further guidance needed on provision of open space?

#### **Part 5: Biodiversity**

16. Does this section clearly set out survey requirements and process for considering biodiversity?
17. Is the technical information in this section up to date and an accurate reflection of biodiversity in Crawley?

#### **Part 6: Countryside and AONB**

18. Does this section adequately define appropriate and detailed character areas for Crawley?
19. Do the character area descriptions and guideline enable applicants to understand the character and role of the area in which the proposal sits?
20. Is the High Weald AONB management Plan sufficient for consideration of planning applications? Is any further detailed guidance needed?

## 2. EMAIL NOTIFICATION OF COMMENCEMENT OF FORMAL PUBLIC CONSULTATION TO CONSULTEE DATABASE

# LOCAL PLAN UPDATE

16 May 2016



Dear,

### SUPPLEMENTARY PLANNING DOCUMENT: CONSULTATION

Following the adoption of the Crawley Borough Local Plan: Crawley 2030, on 16 December 2015, Crawley Borough Council are seeking your views on the following Supplementary Planning Document:

- Green Infrastructure

This document has been prepared to support the interpretation of some of the Policies set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan.

The document is available to view on the council's website: [www.crawley.gov.uk/crawley2030spd](http://www.crawley.gov.uk/crawley2030spd) and in hard copy at the Town Hall and the borough's libraries during normal office hours.

Consultation will take place between 16 May and 13 June 2016. All responses must be made in writing, by **5pm 13 June 2016**, and can be submitted either by email to [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk) or by post to:

Forward Planning  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
RH10 1UZ

Consultation questions are set out within the Green Infrastructure document for your consideration and assistance. However, comments do not have to be restricted to responses to these.

If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or [elizabeth.brigden@crawley.gov.uk](mailto:elizabeth.brigden@crawley.gov.uk)

Kind Regards,

The Forward Planning Team

### More information

For more information, please visit our website [www.crawley.gov.uk/crawley2030spd](http://www.crawley.gov.uk/crawley2030spd).

### Contact us

If you would like to contact the Forward Planning Team, please email us at [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk) or you can phone us on 01293 428624.

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You have received this message as you have expressed an interest in being kept up-to-date with progress on Crawley's Local Plan and/or the Supplementary Planning Documents. If you would not like to receive these updates any more, please respond to this email and let us know. If you know anyone that would like to receive these updates please ask them to email us at [forward.plans@ Crawley.gov.uk](mailto:forward.plans@ Crawley.gov.uk)

**3. LETTER NOTIFICATION OF COMMENCEMENT OF FORMAL  
PUBLIC CONSULTATION TO CONSULTEE DATABASE  
Strategic Housing & Planning Services**



Contact: Elizabeth Brigden

Date: 16/05/2016

Direct Line: 01293 438624

Email: [Forward.Plans@crawley.gov.uk](mailto:Forward.Plans@crawley.gov.uk)

---

Lee Harris  
Chief Executive Directorate

Dear Sir or Madam,

**SUPPLEMENTARY PLANNING DOCUMENT: CONSULTATION**

Following the adoption of the Crawley Borough Local Plan: Crawley 2030, on 16 December 2015, Crawley Borough Council are seeking your views on the following Supplementary Planning Document:

- Green Infrastructure.

This document has been prepared to support the interpretation of some of the Policies set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan.

The document is available to view on the council's website:

[www.crawley.gov.uk/crawley2030spd](http://www.crawley.gov.uk/crawley2030spd) and in hard copy at the Town Hall and the borough's libraries during normal office hours.

Consultation will take place between 16 May and 13 June 2016. All responses must be made in writing, by **5pm 13 June 2016**, and can be submitted either by email to [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk) or by post to:

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Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
RH10 1UZ

Consultation questions are set out within each document for your consideration and assistance. However, comments do not have to be restricted to responses to these.

If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or [elizabeth.brigden@crawley.gov.uk](mailto:elizabeth.brigden@crawley.gov.uk)

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'E. Brigden'.

Elizabeth Brigden  
Planning Policy Manager

## 4. EMAIL REMINDER TO CONSULTEE DATABASE

# LOCAL PLAN UPDATE

7 June 2016



Dear,

### **GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT REMINDER: CONSULTATION DEADLINE 5PM 13 JUNE 2016**

Following the adoption of the Crawley Borough Local Plan: Crawley 2030, on 16 December 2015, Crawley Borough Council are seeking your views on the following Supplementary Planning Document:

- Green Infrastructure

This document has been prepared to support the interpretation of some of the Policies set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan.

The document is available to view on the council's website: [www.crawley.gov.uk/crawley2030spd](http://www.crawley.gov.uk/crawley2030spd) and in hard copy at the Town Hall and the borough's libraries during normal office hours.

Many thanks to those who have already submitted comments, they are being collated and will be taken into account when preparing the document in its final form for adoption by the council.

Should you still wish to comment on the document, please note that the consultation period will close at **5pm 13 June 2016**. All responses must be made in writing and can be submitted either by email to [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk) or by post to:

Forward Planning  
Crawley Borough Council  
Town Hall  
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Kind Regards,

The Forward Planning Team

**More information**

For more information, please visit our website [www.crawley.gov.uk/crawley2030spd](http://www.crawley.gov.uk/crawley2030spd).


**Contact us**

If you would like to contact the Forward Planning Team, please email us at [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk) or you can phone us on 01293 428624.


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## 5. CRAWLEY BOROUGH COUNCIL CRAWLEY 2030 SUPPLEMENTARY PLANNING DOCUMENT WEBPAGE



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### Crawley 2030: Supplementary Planning Documents

Crawley Borough Council is commencing work on a number of Supplementary Planning Documents (SPDs) to expand upon the policies established by the Crawley Borough Local Plan 2015 – 2030. Crawley 2030.

**Update: Public Consultation 16 May 2016**

Public consultation is taking place on the following Supplementary Planning Document (SPD):

- [Green Infrastructure](#)

This document has been prepared to support the interpretation of some of the Policies set out within the Local Plan, and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan.

The document is available to view using the links below and in hard copy at the Town Hall and the borough's libraries during normal office hours.

All responses must be made in writing by **5pm on Monday 13 June 2016** and can be submitted either by email to or by post to:

Forward Planning  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
RH10 1UZ

If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or email [Elizabeth.Brigden](#).

#### Green Infrastructure

- [Green Infrastructure SPD](#)
- [Green Infrastructure Map](#)
- [Consultation Statement](#)

Crawley's Green Infrastructure network supports the wellbeing of residents and the environment. Green Infrastructure functions include, but are not limited to: recreation, biodiversity, climate change mitigation/adaptation, drainage, transport, job creation, visual amenity, and food and fuel sources. The SPD sets out the key elements which make up the important assets within the borough and expands upon the requirements of the following Local Plan Policies:

- [Policy CH3: Normal Requirements of All New Development](#)
- [Policy CH8: Tree Planting and Replacement Standards](#)
- [Policy CH7: Structural landscaping](#)
- [Policy CH9: Development Outside the Built-Up Area](#)
- [Policy CH11: Rights of Way and Access to the Countryside](#)
- [Policy ENV1: Green Infrastructure](#)
- [Policy ENV2: Biodiversity](#)
- [Policy ENV3: Local Green Space](#)
- [Policy ENV4: Open Space, Sport and Recreation](#)
- [Policy ENV5: Provision of Open Space, Sport and Recreational Facilities](#)

A key element of green infrastructure planning is taking opportunities, where possible, to create multi-functional green spaces to make the best use available land and to enhance the connectivity of the network, and, in applying the Local Plan policy requirements, consideration should be given to how each functions as part of the wider green infrastructure network.

**Previous Consultations 1 March 2016**

Consultation previously took place on the following two Supplementary Planning Documents (SPD)

### In This Section:

- [Planning and Development](#)
- [Planning Policy](#)
- [Local Plan - Crawley 2030](#)
- [Crawley 2030: Supplementary Planning Documents](#)

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### Contact Us

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- [Planning and Climate Change](#)
- [Urban Design \(including Parking Standards\)](#)

The representations received on these two documents are currently being considered and addressed, wherever appropriate, into the final versions of the SPDs. The consultation versions of the SPDs can be accessed below.

### Planning and Climate Change

- [Planning and Climate Change SPD](#)
- [Guidance Note: Energy and Water Efficiency for Alterations and Extensions to Buildings](#)
- [Consultation Statement](#)

The Planning and Climate Change SPD describes how development in Crawley should be designed in order to comply with those policies in Crawley's Local Plan which address the challenge of climate change. It focuses on the following policies:

- [Policy ENV6: Sustainable Design and Construction](#)
- [Policy ENV7: District Energy Networks](#)
- [Policy ENV8: Development and Flood Risk](#)
- [Policy ENV9: Tackling Water Stress](#)
- [Policy IN3: Development and Requirements for Sustainable Transport](#)

It also provides guidance on the parts of the following policies which contribute to the agenda of addressing climate change:

- [Policy CH3: Normal Requirements of all New Development](#)
- [Policy ENV1: Green Infrastructure](#)

This document includes guidance on the specific information required to accompany planning proposals in order to demonstrate compliance. Following this consultation, and consideration of the representations received, it will be adopted as Supplementary Planning Document and will be a material consideration in planning decisions taken by the council for developments within the borough.

A guidance note has been prepared to accompany the full SPD to assist in applying the Policies relating to energy and water efficiency for alterations and extensions to buildings (including for household planning applications).

### Urban Design

- [Urban Design SPD \(4 MB\)](#)
- [Parking Standards Plans \(2 MB\)](#)
- [Consultation Statement](#)

The Urban Design SPD aims to support applicants in preparing and submitting good quality schemes, which meet national and local planning policy requirements, for planning permission and aid successful navigation through the council's Development Management process. The urban design principles and guidance in the document relate to all development of all scales and uses.

It provides additional guidance in order for applicants to meet the requirements set by the following Local Plan Policies:

- [Policy CH1: Neighbourhood Principles](#)
- [Policy CH2: Principles of Good Urban Design](#)
- [Policy CH3: Normal Requirements of All New Development](#)
- [Policy CH4: Comprehensive Development and Efficient Use of Land](#)
- [Policy CH5: Standards for All New Dwellings \(including conversions\)](#)
- [Policy CH9: Important Views](#)
- [Policy CH9: Development outside the Built-Up Area](#)
- [Policy IN4: Car and Cycle Parking Standards](#)

The draft Urban Design SPD provides guidance specifically related to development affecting heritage assets: within designated areas, or of buildings and structures. Expanding upon the Policies established in the Crawley Borough Local Plan:

- [Policy CH12: Heritage Assets](#)
- [Policy CH13: Conservation Areas](#)
- [Policy CH14: Areas of Special Local Character](#)
- [Policy CH15: Listed Buildings and Structures](#)
- [Policy CH16: Locally Listed Buildings](#)
- [Policy CH17: Historic Parks and Gardens](#)

Two options are provided in the Annex in relation to the Crawley Borough Parking Standards. Once adopted, the final approach set in the Urban Design SPD will supersede the current approach set out in the adopted Planning Obligations and S106 Agreements SPD.

### Topic Areas

The SPDs will not make new planning policy, but will aid the interpretation and implementation of the adopted Crawley Local Plan. The topic areas currently being prepared as SPDs are:

- [Affordable Housing](#)



- Climate Change
- Design
- Green Infrastructure
- Town Centre

These SPDs will eventually replace the existing suite of supplementary planning guidance notes and some of the other SPDs. Manor Froyal SPD and Design Guide will remain a council adopted document, as will Development of Gatwick Airport SPD.

The adopted Planning Obligations and S106 Agreements SPD will be amended alongside the introduction of the Community Infrastructure Levy (CIL) in Crawley. More details can be found on the council's dedicated CIL webpage:

[www.crawley.gov.uk/CIL](http://www.crawley.gov.uk/CIL).

The SPDs will provide guidance and expansion of the Local Plan policies where it is concluded that additional information adds value, beyond that which is already provided in the Policies and supporting text of the Crawley Borough Local Plan.

#### Who are they for?

The SPDs will be aimed at individuals and companies who wish to make a successful planning application. This will include:

- Householders
- Businesses
- Landowners

#### Why do we need SPDs?

The SPDs will seek to provide guidance for applicants to meet the policy requirements set by the Local Plan, and offer information as to what is expected at each of the key stages relating to the making of a planning application:

- Pre-application;
- Submission & validation;
- Planning application;
- Post-planning permission.

#### Involvement and Engagement

If you are interested in being involved and kept informed on the progress of the SPDs please contact [Forward Planning](#) with your name and contact details, along with the topic area, or areas, you are interested in. You are welcome to be engaged in as many or as few of the SPDs as you would wish to be.

We welcome your views on the following questions.

#### General Consultation Questions

**Q1:** Do the topics identified cover the main areas requiring additional guidance?

**Q2:** Are any of the topics considered unnecessary?

**Q3:** Are there any additional topics which haven't been identified as a Supplementary Planning Document which the council should consider?

**Q4:** Are the policies identified to be covered by the SPDs appropriate?

**Q5:** Should any of the policies be addressed in a different SPD to that identified in the table?

**Q6:** Should policies only be covered by one SPD rather than considered by each relevant topic area?

**Q7:** Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) that haven't been identified which should be considered for inclusion in one of the SPDs?

**Q8:** Should the SPDs focus solely on statutory planning policy guidance or should they offer best practice examples and be used to provide advice and suggestions beyond the remit of planning policy, within the topic area?

**Q9:** Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage?

## APPENDIX C: CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES

GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT			
Respondent	Para/ Page no.	Comments	Council's Response
Surrey County Council		Thank you for consulting Surrey County Council. We do not have any comments on ' <b>Green Infrastructure Supplementary Planning Document</b> '.	Noted. No further action.
Sussex Biodiversity Record Centre		<ul style="list-style-type: none"> <li>FANTASTIC that you are signposting applicants and developers to SxBRC. I'm really keen that the information we provide is used to inform the planning process from the earliest stages. I'd love to see applicants coming to us routinely for a desktop biodiversity report to inform their responses to any biodiversity screening questions, for example. And obviously it's essential that they come to us for data if they're carrying out any kind of ecological survey.</li> <li>(Just so you're aware: all data requests relating to the submission of a planning application are classified as 'commercial' and we therefore charge a fee to cover our administrative costs – regardless of whether it's the householder / applicant coming to us for data or a commercial consultant acting on their behalf. We're currently looking at the categories we use for data requests as some householders find the 'commercial' terminology confusing, but we will always charge a fee if the data request is for a planning application).</li> <li>Perhaps worth flagging that SxBRC also provides information on all designated sites (statutory and non-statutory) and priority habitats in the search area. We hold more comprehensive information on priority habitats than is available in the national inventories (through the Natural England website) as our information is continuously updated.</li> <li>Regarding designated sites, it may also be worth signposting applicants to SxBRC for information on the location of Local Wildlife Sites (SNCIs) as this would be included in a standard desktop biodiversity report. I had a quick look on the <a href="http://Crawley.gov.uk">Crawley.gov.uk</a> website and it looks like the Local Wildlife Sites are listed, and there's a google map showing their locations, but the boundaries are not clear.</li> </ul>	<p>Noted.</p> <p>Noted.</p> <p>This has been included in Paragraph 5.35(2) to help applicants locate important information.</p> <p>Local Wildlife Site boundaries are shown on the Local Plan Map.</p>

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<ul style="list-style-type: none"> <li>Regarding provision of survey data (section 5.40) – perhaps we could have a chat about this? I welcome the general principle but I think in practise we might struggle to deal with reports submitted in the way described. CIEEM has recently published guidelines on Accessing and Using Biodiversity Data<sup>2</sup> and you could perhaps align your requirements with this. All relevant biodiversity data obtained must be submitted to SxBRC either directly or through the Consultants Portal (see <a href="http://www.consultantsportal.uk/">http://www.consultantsportal.uk/</a>). We're currently trialling the use of the Consultants Portal with The Ecology Consultancy; if we get their data through OK, using our existing data flow arrangements, then we'd be happy for all consultants to use the portal. The <i>Species Recorder</i> data entry tool for Excel is getting rather out of date now, so we probably wouldn't want to signpost people to that.</li> </ul>	<p>This section has been amended to reflect the up-to-date method of submitting survey data.</p>
<p>Gatwick Airport Limited: Aerodrome Safeguarding</p>		<p>Thank you for your email dated 16 May 2016, regarding the above mentioned document.</p> <p>We have assessed the document from an aerodrome safeguarding perspective and our main concern is in connection with 'Wildlife Hazard Management'. Aerodrome operators are required by the International Civil Aviation Organisation (ICAO), European Aviation Safety Agency (EASA) and UK Civil Aviation Authority (CAA), to take necessary steps to ensure that the hazard is assessed and the risk is reduced to the lowest practicable level.</p> <p>Aircraft are vulnerable to birdstrikes and it has been identified as one of our top risks, therefore it is important that any proposed developments do not increase the wildlife hazard risk over and above that which already exists.</p> <p>With regard to aerodrome safeguarding our area of concern stretches out in a 13km circle which is centred on the runway and is shown on the 'Coloured Squares' Consultation map which is lodged with yourselves. Further details of this can be found in DfT, ODPM Circular 01/2003 'Safeguarding of Aerodromes, Technical Sites &amp; Military Explosives Storage Areas.....' under Annex 2 paras 7 – 9.</p>	<p>A section on aerodrome safeguarding and birdstrike hazards has been included.</p>

<sup>2</sup> (see [http://www.cieem.net/data/files/Publications/Guidelines\\_for\\_Accessing\\_and\\_Using\\_Biodiversity\\_Data.pdf](http://www.cieem.net/data/files/Publications/Guidelines_for_Accessing_and_Using_Biodiversity_Data.pdf))

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p>By working together it is possible to achieve both biodiversity gain without increasing the risk to the airport.</p> <p>Our comments are as follows:</p> <p><b><u>Part 1 – Introduction</u></b>            Questions 1&amp; 2: No aerodrome safeguarding comments.</p> <p><b><u>Part 2 – The Green Infrastructure Network</u></b>            Questions 3 – 5 &amp; 7 – 9: No aerodrome safeguarding comments.</p> <p><b>Question 6 – Is the guidance on landscaping &amp; maintenance helpful to applicants?</b></p> <ul style="list-style-type: none"> <li>With regard to ‘Landscape Design for new Developments’ paras 2.15 to 2.18, mention should be made of the need to take aerodrome safeguarding requirements into consideration, possibly under Para 2.18. For example ‘Gatwick Airport Ltd should be consulted at an early stage to ensure that any proposed landscaping will not increase the birdstrike risk to the airport, please email <a href="mailto:gal.safeguarding@gatwickairport.com">gal.safeguarding@gatwickairport.com</a> who will be happy to advise’.</li> </ul> <p><b><u>Part 3 – Trees</u></b>  <b>Question 10:</b> No aerodrome safeguarding comments.</p> <p><b>Question 11:</b> See response to question 12 below.</p> <p><b>Question 12: Are there any issues that we have not covered which you would like to draw our attention to?</b>            Aerodrome safeguarding requirements have not been mentioned and we feel that mention should be made as follows:</p> <ul style="list-style-type: none"> <li>With regard to ‘New Tree Planting &amp; Replacement Planting’ Paras 3.7 to 3.37. Under Paras 3.22 &amp; 3.23, mention should be made of the need to consider aerodrome safeguarding in relation to wildlife hazard risk management at an early stage. For example ‘Gatwick Airport Ltd should be consulted at an early stage to ensure that any proposed tree planting will not increase the bird strike risk to the airport please email <a href="mailto:gal.safeguarding@gatwickairport.com">gal.safeguarding@gatwickairport.com</a> who will be happy to advise’.</li> </ul>	

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p><b>Part 4 – Open Space</b>  <b>Questions 13 &amp; 14:</b> No aerodrome safeguarding comments.</p> <p><b>Question 15 – Is further guidance needed on provision of open space?</b>  Mention should be made of the need to consider aerodrome safeguarding in relation to wildlife hazard risk management, possibly under Para 4.36. For example 'Gatwick Airport Ltd should be consulted at an early stage with regard to green roofs, hedgerow planting, improvements to watercourses and water bodies, landscaping &amp; implementation of SUDS, to ensure that the proposals will not increase the birdstrike risk to the airport, please email gal.safeguarding@gatwickairport.com who will be happy to advise'.</p> <p><b>Part 5 - Biodiversity</b>  <b>Question 16 – Does this section clearly set out survey requirements and process for considering biodiversity?</b></p> <ul style="list-style-type: none"> <li>• With regard to 'Biodiversity in the Development Process', in Figure 5. 'Pre Application Stage'. A further stage should be added as follows:  <i>'Are the biodiversity enhancements/planting of a type that are likely to attract birds to the site? (for further general guidance please refer to the AOA Advice Notes at <a href="http://www.aoa.org">www.aoa.org</a> ). If so please contact <a href="mailto:gal.safeguarding@gatwickairport.com">gal.safeguarding@gatwickairport.com</a> for further advice.</i></li> <li>• With regard to 'Enhancing Biodiversity &amp; Habitat Creation' under Para 5.63. reference should be made to the AOA Advice Notes as mentioned above.</li> <li>• With regard to 'Landscaping' under Para 5.75 a bullet point should be added in relation to aerodrome safeguarding as follows:  <i>'The potential for increasing in particular birdstrike risk to the airport depends on several factors for example the proposed development, species of bird present and existing conditions around the site. For example the following can have an impact:</i>  <u>Proposed Landscaping &amp; Amenity Planting</u>  <i>The location &amp; density of landscaping &amp; amenity planting can have an impact upon the potential risk of birdstrike as it could attract birds such as Pigeons, Corvids &amp; Starlings in large numbers, depending on the amount</i></li> </ul>	

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p><i>and type of planting and its proximity to the airport. It may provide nesting and roosting habitats. Large unbroken blocks of planting are more likely to attract roosting, nesting or feeding birds rather than small blocks of widely spaced trees.</i></p> <p><u>Restoration, Enhancement &amp; Creation of New Watercourses &amp; SUDS</u>  <i>Water bodies and their associated features, depending on their size and shape and proximity to the airport have the potential to attract birds hazardous to aviation such as Gulls, Geese, Swans, Heron, Cormorants &amp; smaller waterfowl for feeding, nesting and roosting. Further general information can be found in the AOA Advice Notes at <a href="http://www.aoa.org">www.aoa.org</a></i></p> <ul style="list-style-type: none"> <li>With regard to 'Green Roof &amp; Living Walls' under Paras 5.79 to 5.82 a Para should be inserted with regard aerodrome safeguarding requirements as follows:  <i>'Large areas of flat/shallow pitched and green roofs can be attractive to large numbers of Gulls and Pigeons for nesting roosting and loafing. If a proposed development includes roofs of this type, depending on its proximity to the airport, it may be necessary to agree a bird hazard management plan with Gatwick Airport Ltd to ensure that the birdstrike risk to the airport is not increased'.</i></li> </ul> <p><b>Question 17:</b> <i>No aerodrome safeguarding comments.</i></p> <p><b>Part 6 – Countryside &amp; AONB</b>  <b>Questions 18 -20</b> <i>No aerodrome safeguarding comments</i></p> <p>As an alternative to mentioning aerodrome safeguarding under each section as per the above, the following could be inserted at the beginning of the document as follows:</p> <p><b>Aerodrome Safeguarding – Wildlife Risk Management</b>  <i>It is important to ensure that proposed developments that have the potential to attract wildlife the vicinity of the aerodrome are properly assessed. Aircraft are vulnerable to bird strikes and birds moving between sites located off the aerodrome can increase the birdstrike risk. Birdstrikes by all species have the potential to result in damage and delays to aircraft operations.</i></p>	

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p><i>It is important that any proposed developments do not increase the wildlife hazard risk over and above that, which already exists, by increasing the population of hazardous birds on the site and in the vicinity of the aerodrome, or by the formation of flight lines that enter critical airspace. The internationally accepted safeguarding area with reference to bird strike hazards is a 13km radius around the aerodrome.</i></p> <p><i>The matters to be taken into consideration are:</i></p> <p><u><i>Proposed Landscaping &amp; Amenity Planting</i></u>  <i>The location and density of landscaping and amenity planting will have an impact upon the potential risk of birdstrike as it could attract birds such as Pigeons, Corvids &amp; Starlings in large numbers, depending on the amount and type of planting and its proximity to the airport. It may provide nesting and roosting habitats and large unbroken blocks of planting are more likely to attract roosting, nesting or feeding birds rather than small blocks of widely spaced trees.</i></p> <p><u><i>Restoration, Enhancement &amp; Creation of New Watercourses &amp; SUDS</i></u>  <i>Water bodies and their associated features, depending on their size and shape and proximity to the airport have the potential to attract birds hazardous to aviation such as Gulls, Geese, Swans, Heron, Cormorants &amp; smaller waterfowl for feeding, nesting and roosting.</i></p> <p><u><i>Flat/Shallow Pitched &amp; Green Roofs</i></u>  <i>Large areas of flat/shallow pitched and green roofs can be attractive to large numbers of Gulls and Pigeons for nesting roosting and loafing. If a proposed development includes roofs of this type it may be necessary to agree a bird hazard management plan to ensure that the birdstrike risk to the airport is not increased.</i></p> <p><i>Gatwick Airport Ltd are supportive of biodiversity and are keen to work with both LPA's and developers to ensure that biodiversity gains are met without increasing the wildlife strike risk to the airport.</i></p>	
Thames Water		<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.</p>	<p>This has been added to the designing with trees section.</p>

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough and are hence a “<b>specific consultation body</b>” in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water:</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, in order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p>	
Highways England		<p>Thank you for inviting Highways England to comment on the Crawley Borough Council Green Infrastructure SPD Consultation.</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 will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.</p> <p>We do not have any comments.</p>	Noted. No further action.
Natural England		<p>Thank you for consulting Natural England on the Crawley Local Plan's G.I SPD. Natural England notes and welcomes the provision of this. We have the following comments to make:</p> <p><u>General points</u></p> <ul style="list-style-type: none"> <li>We support the provision of spatial Strategic network which is highlighted for its multifunctional benefits to wildlife and people. We support the inclusion of this SPD as it provides a strategic joined-up approach to safeguarding G.I. rather than a piecemeal approach from individual applications. We advise that this approach is key to identifying and protecting G.I and wildlife corridors from future impacts thorough development.</li> </ul>	Ecosystems services is now mentioned in the overarching Green Infrastructure section with the protection and enhancement of ecosystems services implicit throughout the document.



**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<ul style="list-style-type: none"> <li>We Support policy ENV1 Green Infrastructure which requires justification for any application which blocks or damages the identified Network.</li> <li>We advise that Ecosystems Services are included here for the wealth of benefits they bring for vital resources such as water food and cleaner air.</li> </ul>	
	Para 2.5	<p><u>Specific Comments</u></p> <ul style="list-style-type: none"> <li>Paragraph 2.5 states that: <i>Green infrastructure functions include but are not limited to: Recreation, biodiversity, climate change mitigation/adaptation, drainage, transport, job creation, and visual amenity, and food and fuel sources.</i> This should also cite Ecosystems services.</li> </ul>	See above.
		<p><b>Landscaping</b> We advise that landscaping proposals use native species preferably of local provenance to enhance biodiversity.</p>	This is already mentioned in the landscaping section of the SPD.
		<p><b>Ancient Woodland</b> Ancient woodland is an irreplaceable habitat. Once lost it cannot be replaced and this has been recognised in National Planning and Policy Guidance (see below). Ancient woodland should be a clear and vital part of the green infrastructure network. These woodlands and hedgerows/habitats which link them contain a wealth of wildlife and interconnecting wildlife corridors throughout the landscape. These are vital for the maintenance of robust populations of species into the future. We advise that the maintenance and enhancement of these key habitats through the landscape should be a vital component of any G.I network.</p> <p>We advise that NPPF Paragraph 118 is cited here which gives protection to ancient woodland as follows:</p> <p><i>planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;</i></p> <p>We refer you to Natural England's standing advice on ancient woodlands for more information.</p>	Protection of ancient woodland under NPPF and Local Plan policy is now referred to in the ancient woodland section of the SPD.

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p><b>Open space</b> We advise that open space could be considered as multifunctional rather than simply providing recreational space or allotments for example. A single space could be considered for combinations of these, for example play space and natural greenspace for children to experience nature.</p>	<p>The open space section ensures that a sufficient amount of good quality open space is in the right location but a section has been added to reference the benefits of multifunctional open space.</p>
		<p><b>Biodiversity</b> Clear links to habitats and the potential for enhancing and linking these should be more clearly shown on the attached map.</p> <p>Links to wellbeing from experiencing natural habitats and spaces should be included,</p> <p>Opportunities for linking up G.I beyond Crawley's boundaries should also be explored here</p> <p>We hope these comments are helpful</p>	<p>The opportunities for enhancing/linking habitat are shown as biodiversity opportunity areas. Identification of further opportunities within and beyond Crawley's boundary will be developed further through partnership working. The Green Infrastructure Map and SPD will be updated periodically to reflect this.</p>
The Woodland Trust	2.14	<p>We would wish to see no damage to or loss of ancient woodland.</p> <p>Ancient woodland is defined as land that has been wooded continuously since at least 1600, though many ancient woods are much older than this, and some may even form a link with the primeval woodland that covered the UK after the last Ice Age.</p> <p>Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable.</p> <p>Their long continuity and lack of disturbance means ancient woods are often also living history books, preserving archaeological features and evidence of past land use, from earthworks to charcoal pits. They are also places of great aesthetic appeal, making them attractive for recreation and the many benefits this can bring in terms of health and well being.</p>	Comments noted.

## GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT

Respondent	Para/ Page no.	Comments	Council's Response
		<p>With only 2.4% of the land area in Great Britain covered by ancient woodland, it is essential that no more of this finite resource is lost. This means that ancient woodland must be protected absolutely from permanent clearance, but also that it must be protected from damaging effects of adjacent and nearby land-use that could threaten the integrity of the habitat and survival of its special characteristics.</p> <p>It is not possible to replace ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna.</p>	
	2.16	<p>We suggest adding these points:</p> <p>Trees can improve air quality.</p> <p>Trees can help with water management eg reduced flood risk, improved water quality.</p> <p>For more information, visit <a href="https://www.woodlandtrust.org.uk/plant-trees/why-plant-trees/water-management/">https://www.woodlandtrust.org.uk/plant-trees/why-plant-trees/water-management/</a></p>	This has been added to paragraph 2.16 which lists the benefits of open space.
	3.1	We would wish to see an aspiration to increase canopy cover.	This has been added to the beginning of tree section.
	3.7	We suggest planting a range of native trees (depending on site conditions) – using different species will help mitigate the potential effects of tree disease.	Advice on providing native trees is included in the landscaping and biodiversity sections as the tree section is primarily focused on retention and protection of trees.
	3.40	<p>We suggest moving this to be the first point about ancient woodland. We suggest adding this additional wording taken from the Standing Advice (2015):</p> <p>“...developers should start by looking for ways to avoid the development affecting ancient woodland or veteran trees eg by redesigning the scheme.”</p> <p><u>Query:</u> Have you had official notification from Natural England about the new Standing Advice? The wording you use is from the 2014 Standing Advice pdf</p>	This section has been amended to include some information from the standing advice and reference national/Local Plan policy to provide a clearer position on ancient woodland.
	3.41	Please add the Woodland Trust as consultees.	Whilst there are no statutory consultees for applications which affect ancient woodland the Forestry Commission

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
			has been chosen as a consultee as set out in the National Planning Policy Guidance. However, this request will be considered when the council's list of non-statutory consultees is reviewed.
	3.42	<p>There is no clear definition of a veteran tree. Therefore, any tree of a good age for its species may have potential to become a veteran tree and the advice of an Arboriculturalist will be needed to identify trees that could be considered veteran.</p> <p>Suggest amending the text above to include wording from the Standing Advice on <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a></p> <p>'Therefore, any tree of a good age for its species or exhibiting senescence may be a veteran tree and the advice of an Arboriculturalist will be needed to identify trees that could be considered veteran.</p>	Suggested wording has been included to provide guidance on what a veteran tree is.
	3.45	We would like to be consulted on any proposed felling of veteran trees.	This will be considered when the council's list of non-statutory consultees is reviewed.
The Wilky Group		<p>This is a representation on Crawley Borough Council's Green Infrastructure SPD, submitted on behalf of The Wilky Group (TWG).</p> <p>TWG has been promoting a strategic business park aligned with the economic objectives of the Gatwick Diamond, the growth of the Airport and the economic needs of Crawley. The land was promoted via the Crawley Local Plan Examinations in 2006/7 and 2015. A masterplan was prepared covering land shown edged red on the attached plan*. TWG owns land between Balcombe Road (B2036) and Peeks Brook Lane to the south of the M23 spur road.</p> <p>I have reviewed the Green Infrastructure SPD and have no comments to make on its guidance, which I assume will be applied in a flexible and pragmatic way in relation to the above-mentioned land, recognising that it falls within an Area of Search for a Strategic Employment Location(s) within the adopted Crawley BLP (2015) – Policy EC1. The land could accommodate a strategic business park, incorporating existing green infrastructure and additional green linkages /</p>	<ol style="list-style-type: none"> <li>1. The GI Map has been amended to improve legibility. The possibility of an interactive GI map will also be explored which will give users the opportunity to turn layers on/off.</li> <li>2. The mapping of rivers will be explored in consultation with the Environment Agency and the GI map updated accordingly.</li> </ol>

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		<p>planting to deliver a sustainable development, taking account of the context of the site and its existing landscape framework.</p> <p>The Green Infrastructure Map shows a number of environmental features within the above-mentioned land, comprising ancient hedgerows, River Centrelines and a Footpath. In relation to two of these features, the following comments are made:</p> <ol style="list-style-type: none"> <li>1. A Footpath is shown on the GI Map extending north from Fernhill Road along Donkey Lane. This Footpath extends north towards the M23 spur road, and then west to join Balcombe Road, but this part of the Footpath does not show up clearly on the GI Map. The Map should be amended to show more clearly the full length of this Footpath.</li> <li>2. A number of River Centrelines are shown on the GI Map. The 'River Centrelines' shown are dry (ephemeral) ditches, performing a field drainage function during wet weather. These dry ditches do not constitute Main River as defined by the Environment Agency's online Main Rivers Map, so should not be defined on the GI Map as 'River Centrelines'. Such features are defined by the Environment Agency as 'Ordinary Watercourses' – the GI Map should be amended to either (1) remove the features from the above-mentioned land, or (2) revise the GI Map and key to show these features within the above-mentioned land as 'Ordinary Watercourse Centrelines'.</li> </ol> <p>I trust the above representations assist the Council in reviewing the Green Infrastructure SPD and in making final changes prior to its adoption.</p> <p>Please don't hesitate to contact me if you need any further clarification or information.</p>	
Gatwick Airport Limited		<p>Background</p> <p>Gatwick Airport is the UK's second largest airport and the most efficient single-runway airport in the world. It serves more than 200 destinations in 90 countries for more than 40 million passengers a year on short and long-haul point-to-point services. It is a major economic driver for the South-East region, generating around 21,000 on-airport jobs and a further 10,000 jobs through related activities. The airport falls within Crawley Borough and is 28 miles from the UK's main economic hub of London with excellent public transport links to</p>	Noted.

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		<p>the City, including the Gatwick Express. Gatwick Airport Limited is a proactive member of the Crawley Business Community and wider sub region.</p> <ul style="list-style-type: none"> <li>• This note sets out GAL's formal comments as an interested party in this Consultation and as the owner and operator of Gatwick Airport.</li> <li>• GAL's submission to this Consultation is made with particular regard to positively and appropriately developing suitable planning guidance on Green Infrastructure which may be in close proximity to the airport.</li> <li>• GAL request to be notified of any amendments made to the Draft SPD following the Public Consultation and of the next stages in progressing the Green Infrastructure SPD through to adoption.</li> </ul>	
		<p>Gatwick Airport Limited (GAL) greatly welcomes the opportunity to comment upon the new Crawley Borough Council Green Infrastructure SPD. Gatwick Airport Limited is proactive in striving to continuously improve in areas of environmental sustainability. As a stakeholder within the Crawley community GAL has made key commitments addressing issues of sustainability. GAL clearly recognises the important role of Green Infrastructure locally and cumulatively across the sub region. GAL are proud to have been awarded by the Wildlife Trust a Bench Mark Award in recognition of the environmental best practices that GAL has firmly adopted particularly in terms of managing valuable habitats and its biodiversity enhancement strategies.</p> <p>The proximity of the airport to Crawley has had an important influence upon the shaping of the Green Infrastructure of the Borough. GAL therefore considers it is crucial that we continue to engage in a long term working with CBC to support the aims of the Draft SPD in gaining positive Green Infrastructure networks in Crawley Borough and the wider area.</p>	Noted.
		<p>GAL has been fully engaged in the recent review process of the newly adopted 'Crawley 2030' Local Plan. GAL recognises that the key principles for achieving sustainable development are embedded within the new CBC Local Plan which provides the overarching planning policy direction for future development of Green Infrastructure. GAL is fully supportive of the production of this more detailed document Supplementary Planning Document (SPD) which will provide the planning policy in greater detail and add to the robustness of the development proposals in Crawley. The SPD will be an</p>	Noted.

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		<p>important planning tool for assisting developers in achieving more sustainable forms of development.</p> <p>The Government is currently considering whether Gatwick should be permitted to grow and build a new runway. Expansion at Gatwick would provide an even greater economic boost with a new runway by 2025. It is widely recognised that the local economic benefits would however be appreciated far in advance of a second runway actually opening with many socio economic benefits potentially being realised almost immediately within local communities particularly Crawley. If Government afforded permission for a second runway to be developed at Gatwick Airport then it is acknowledged that there would need to be a Review of the CBC Local Plan. The Local Plan has laid down planning policies which are relevant to the current single runway configuration of the airport and the Draft SPD is therefore also applicable to the airport in its existing one runway operation. If a twin runway configuration was to be introduced GAL would like to highlight that the Draft Green Infrastructure SPD would also need to be reviewed in line with the bringing forth of a nationally significant project. It is highly probable that a full review of Green Infrastructure SPD would be required due to the scale of a potential second runway development. It may also be considered more pragmatic that a separate standalone Green Infrastructure Management Plan for R2 would be necessary if the proposed second runway were to be realised in time.</p> <p>Therefore the comments provided by GAL to this consultation are within the context of the airport operating as a single runway operation only as that is the adopted position of the current Local Plan.</p>	
		<p><b>Aerodrome Safeguarding</b>                      GAL considers that the SPD is seriously lacking in the consideration the implications of Green Infrastructure on aerodrome safeguarding and the potential conflicts which may occur. Developers need to be aware of the need for green infrastructure proposals to be compatible with the requirements of aerodrome safeguarding in order to reduce the risk of the potential for bird strike for example. GAL has therefore submitted to CBC a separate set of consultations documents which focus upon addressing the Draft SPD and matters of Aerodrome Safeguarding.</p>	<p>A section on aerodrome safeguarding has been added.</p>

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		<p><b>Gatwick Airport Limited Consultation Comments:</b></p> <p>In response to the SPD Consultation GAL would like to put forward the following broader comments:</p> <p>GAL welcomes the vision CBC have set out for in the SPD and broadly supports the Green Infrastructure and planning policies CBC are aspiring to adopt.</p>	Noted.
		<p>GAL would welcome the creation of a Green Infrastructure online micro – (site as has been established for 'Regenerating Crawley') as a positive communications channel. Ambitious Green Infrastructure schemes can only be fully realised with clear channels of communications engaging the involvement of the wider Crawley community, businesses, public and private sector partners, developers and residents.</p>	Noted. This is something that the council could explore following the adoption of the SPD alongside working with other local authorities to create a strategic approach to GI delivery.
		<p>The visitor experience can positively impact upon economic regeneration and enhanced footfall can be achieved by simply making it more attractive green spaces to spend recreational time. The quality and type of surface access and overall connectivity of Green Infrastructure can be a key factor in its success. It has been recognised that there needs to be a good access to green environments for pedestrians to enjoy the greater benefits Green Infrastructure can bring. Creating more walkable green spaces will increase footfall and usage of green amenity space, which is also a key factor for regeneration. A successful and sustainable green space network requires development integrated with good pedestrian and cyclist routes, and efficient public transport. Improved pedestrian and public transport options to green spaces in the Borough will not only encourage greater usage but also promote a lower carbon footprint and contribute towards improving air quality which are essential features of sustainable growth.</p>	Comments noted. Reiterating the benefits of GI are welcomed and set out in the SPD.
		<p>Summary                      GAL supports the ambitions and policy basis of the guidance laid out in the CBC SPD. GAL has presented constructive comments to feed into the development of a pragmatic and successful Green Infrastructure SPD. GAL has noted that the comments provided are within the context of the airport in its current single runway operation (and if a twin runway configuration was</p>	As above.



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		<p>realised then GAL considers that there would need to be a further review of the SPD). GAL welcomes the opportunity to continue to work alongside CBC and explore how we can further support the delivery of this important SPD planning tool.</p> <p>If you have any queries or would like to further discuss the comments put forward by GAL please do not hesitate to contact me.</p>	
		<p><u>Are there any other issues or areas of the policy that need further clarification and do you have any further suggestions to help applicants meet the requirements of Local plan Policies covered in this SPD?</u></p> <p>The “key diagram” on page 12 of the Crawley Local Plan ( CLP), and the larger figure on Page 124 show that the area to the south and east of Gatwick is designated as an “area of search for future employment land (Policy EC1)” and that it is also safeguarded land for the development of a second runway. However, this land is also identified on the Green Infrastructure Plan as being a “biodiversity opportunity area”.</p> <p>The Green Infrastructure Plan should acknowledge the designations within the overarching CLP to make it clear, that whilst the area may have potential for biodiversity, it is otherwise being safeguarded for employment land or for development of a second runway (policies EC1 and GAT2).</p> <p>The supplementary planning document should be clear that inclusion on the Green Infrastructure plan of these areas should not restrict development compatible with EC1, GAT1, GAT2 and GAT3, or give more weight than is appropriate to provision of green infrastructure in these areas above other uses compatible with the designations in the CLP.</p> <p>[For example, Figure 4 on page 36 of the Consultation document Crawley's Designated Biodiversity Sites includes the “biodiversity opportunity areas” on it.]</p>	<p>The GI map has been amended to show the area of search and Gatwick Safeguarding to highlight the development opportunities depending on the outcome of the decision on additional runway capacity in the UK.</p>
		<p><u>Please let us know if you have any examples (including photos) in Crawley which show good green infrastructure planning.</u></p> <p>The diversion of the River Mole around the north west perimeter of Gatwick is an excellent example of how delivery of multifunctional green infrastructure</p>	<p>Noted.</p>

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		<p>within a wider Project, provide public access to an area attractive to wildlife. An image of the river diversion is shown below.</p> <p>photo</p>	
		<p><u>Does the GI map fully reflect the green infrastructure assets and general opportunities present in Crawley? If not, how could this be improved?</u></p> <p>See comment above regarding the designation without reference to other Local Plan policies safeguarding employment land and for the wider development of Gatwick Airport.</p>	Noted.
		<p><u>Is the guidance on how applicants should consider green infrastructure clear?</u></p> <p>Generally: Yes it is clear, however this section has omitted to identify constraints on landscaping that apply to Gatwick Airport due to bird strike risk. It should also identify that development should not be incompatible with the requirements of DfT/ODPM Circular 1/2003 - advice to local planning authorities on safeguarding aerodromes and military explosives storage areas. GAL has submitted a separate set of consultation comments specifically looking at how the SPD needs to fully consider the requirements for Aerodrome Safeguarding. The current SPD is significantly lacking in its content on Aerodrome Safeguarding and the need for developers to engage with the Council and GAL to ensure that there are no potential conflicts regarding green infrastructure proposals and the need to ensure the safe and efficient operation of the airport.</p>	Noted. See earlier comments/response.
		<p><u>Are the green assets and opportunities to deliver benefits sufficiently covered?</u></p> <p>No comment</p>	Noted. No further action.
		<p><u>Is the guidance on landscaping and maintenance helpful to applicants?</u></p> <p>No comment</p>	Noted. No further action.
		<p><u>7. Does the guidance enable proposals impacting structural landscaping to adequately assess the impacts?</u></p>	Noted. No further action.

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		<p><u>8. Does the rights of way section highlight the key issues for applicants to consider?</u></p> <p><u>9. Are you aware of any other opportunities for enhancing the rights of way network?</u></p> <p>No comment</p>	
		<p><u>CONSULTATION QUESTIONS: PART 3 TREES</u></p> <p><u>10. Is the guidance for provision of one tree per new dwelling and on tree replacement standards clear?</u></p> <p><u>11. Are there any other considerations in the type and location of new and replacement tree planting?</u></p> <p><u>12. Are there any issues we have not covered which you would like to draw our attention to?</u></p> <p>Paragraph 3.13 provides for a financial payment to the Council of £700 or £3319</p> <ul style="list-style-type: none"> <li>• Where development results in the loss of council owned trees in open ground.</li> <li>• Where development results in the loss of trees on the development site, and is unable to provide replacement tree planting on site.</li> </ul> <p>Paragraph 3.14 provides for a compensation ratio of trees to be replaced which is related to the girth of the trees lost.</p> <p>Given that GAL may advance a DCO for the Government allows for a second runway development at Gatwick Airport and the DCO will provide for replacement habitat areas within it GAL therefore considers that it should not be subject to either the financial contribution element above with regards to a second runway development. Furthermore and the ratio of trees to be replanted should be determined in the context of specific conservation objectives following appropriate environmental assessment. The supplementary planning document should thus acknowledge that large projects may have alternative delivery mechanisms which meet the requirements of ENV1, and other policies including CH6, CH7 and CH8.</p>	<p>Comments noted. Acknowledging the DCO process under a second runway scenario is unnecessary in this SPD.</p>

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		<p>GAL strongly considers that the guidance should make clear that should a new runway be brought forward at Gatwick then the approach to replacement planting will need to be subject to its own provisions and review considered at that time.</p> <p>GAL again would refer to the separate consultations comments submitted by GAL in reference to the need for the SPD to further acknowledge the need for aerodrome safeguarding constraints - which may limit certain tree species types and may require innovative solutions to avoid risk to safety and compromising the operation of the airport.</p>	
		<p><u>Part 4: Open space</u></p> <p><u>13. Does this section clearly set out what is required to mitigate the impacts of new development on open space and the process for determining proposals on open space?</u></p> <p><u>14. Should there be further guidance from the council on what an applicant would need to assess to determine whether an open space is surplus to requirements?</u></p> <p><u>15. Is further guidance needed on provision of open space?</u></p> <p>There is a flow chart in Figure 3 on page 33 which explains how the re-provision of open space is calculated; Table 7 (p30) provides accessibility standards in terms of walking distances. GAL considers that in the event that a second runway is to be brought forward at the airport then it will give rise to unique circumstances and the need for comprehensive approach and a further policy review to all Green Infrastructure issues.</p>	<p>Comments noted. A second runway being brought forward would trigger a review of the Local Plan.</p>
		<p><u>Part 5: Biodiversity</u></p> <p><u>Policy ENV2 aims to support the Local Plan's objective to deliver a net gain of biodiversity over the Plan period through the incorporation of features to encourage biodiversity in new development wherever possible. The Policy establishes a hierarchy of biodiversity sites against which policy criteria is set. Biodiversity is also protected through a range of other legislation outside of the Planning system.</u></p>	<p>Noted.</p>

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		This section accords generally with what might be expected. GAL is in agreement that the indicative landscape and habitat plan is intended to deliver a net gain in biodiversity in the medium to long term.	
		<p><u>16. Does this section clearly set out survey requirements and process for considering biodiversity?</u></p> <p><u>17. Is the technical information in this section up to date and an accurate reflection of biodiversity in Crawley?</u></p> <p>No comment – as expected.</p>	Noted. No further action.
		<p><u>Part 6: landscape</u></p> <p>No comment – as expected</p>	Noted. No further action.
West Sussex County Council		<p><b>Part 2: The Green Infrastructure Network</b></p> <p>General Comments</p> <p>It is welcomed that the SPD recognises Public Rights of Way (PROW) as a key element of Crawley's GI network and highlights the role of the West Sussex Rights of Way Improvement Plan.</p> <p>In a PROW context we would encourage Crawley Borough Council (CBC) to work with neighbouring District and Parish Councils in support of its desire to protect, enhance and encourage use of the various routes within the Borough. This will help to make routes continuous and also identify logical alternatives to use of the road network which acts as a deterrent for some users. Access to and from the Borough could be considerably enhanced for non-motorised users by maximising use of existing infrastructure, particularly grade-separated crossings of the M23 motorway.</p> <p>We would agree with the key issues for the accessibility of GI within and close to the Borough that are set out in paragraph 2.27. Suggested additions to the 'opportunities' paragraph are as follows:</p> <ul style="list-style-type: none"> <li>• Cycle and equestrian access to/from Ifieldwood;</li> <li>• Cycle access into/from Buchan Country Park from St Clement Road;</li> <li>• Cycle and equestrian access from Tilgate Park into Tilgate Forest and to Parish Lane;</li> </ul>	Additional opportunities have been added to the list which will be reviewed periodically in consultation with WSSC and adjoining authorities.

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		<ul style="list-style-type: none"> <li>• Cycle access to/from Crabbet Park (and possibly equestrian too given its part use as a stables);</li> <li>• Cycle access (and possibly equestrian too) between Tinsley Green and Fern Court Farm;</li> <li>• Cycle access (and possibly equestrian too) between Langley Green and Charlwood; and,</li> <li>• Linking bridleway between existing bridleways 1525/1 and 350Sy.</li> </ul> <p>Staff from our Rights of Way Team would be willing to meet with CBC officers to help identify routes for future creation and enhancement if that will be helpful. We suggest that joint working with WSCC on the development of schemes to improve path surfaces, path widths and changes to path status would help to deliver the ambitions identified by CBC.</p>	
		<p>Q3. Does the GI map fully reflect the green infrastructure assets and general opportunities present in Crawley? If not, how could this be improved?</p> <ul style="list-style-type: none"> <li>• Although the Green Infrastructure Map does have a good representation of the GI within Crawley, some designations are hard to decipher, such as Ancient Woodland and Scheduled Ancient Monuments (particularly within the Forge Wood key housing site) – it would be clearer if these were moved to the front of the layering.</li> <li>• It would also be useful if any significant water bodies such as lakes were mapped.</li> <li>• By restricting the majority of the mapping to the administrative boundary, opportunities to enhance GI or avoid adversely affecting GI could be missed. The GI network reaches beyond the boundary. This is of particular importance when considering opportunities for physical well-being in relation to PROW or cycle links, creating corridors for wildlife or enhancing habitats. It would be beneficial to map the natural green space, woodland and designated areas (including Scheduled Ancient Monuments and Biodiversity Opportunity Areas) within a certain distance of Crawley, perhaps 3km. Cross boundary issues could then be considered.</li> </ul>	<p>The GI map has been amended to improve legibility. For future maps the possibility of an interactive map will be explored so that layers can be turned off/on.</p>
		<p>Q4. Is the guidance on how applicants should consider green infrastructure clear?</p>	<p>This paragraph has been amended to show more clearly the multifunctional benefits of open space.</p>

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		<ul style="list-style-type: none"> <li>On the whole the guidance is clear, however the multifunctional benefits of GI could have greater emphasis. For example in paragraph 2.6 it says: ‘... for housing development, there may be opportunities to create open space to encourage activity and social interaction, footpath links to local shops and services and allotments to encourage locally grown food.’ Further functions could be highlighted as, with good design, a footpath can also incorporate SuDS (which reduce surface water flooding) and trees (which provide shade and a corridor for wildlife).</li> <li>In paragraphs 2.11 and 2.12 is it possible to state that ‘the applicant <i>must</i> ensure that the design of the development ...’ and that ‘Details of green infrastructure <i>must</i> be provided with the planning application ...’ rather than <i>should</i>?</li> </ul>	<p>Para 2.11 and 2.12 have include the requirement for large proposals as set out in policy ENV1.</p>
		<p>Q5. Are the green assets and opportunities to deliver benefits sufficiently covered?</p> <ul style="list-style-type: none"> <li>It would be good to clearly highlight the opportunity new development has to use GI to tackle issues common in urban areas such as surface water flooding, traffic calming, noise pollution and the need to build in resilience to the future effects of climate change.</li> <li>It is important to encourage the use of GI rather than traditional grey infrastructure - the added benefits of GI often make it an attractive alternative from economic, ecological and visual points of view.</li> </ul>	<p>Comments noted.</p>
		<p>Q6. Is the guidance on landscaping and maintenance helpful to applicants?</p> <ul style="list-style-type: none"> <li>Our only query here is that there is no mention of the maintenance of SuDS, this being particularly relevant for above ground SuDS. This aspect may be included within another SPD, if so it would be worth directing applicants to it.</li> </ul>	<p>More detail on SuDS is set out in the Climate Change SPD</p>
		<p><b>Part 5: Biodiversity</b></p> <p>Q16. Does this section clearly set out survey requirements and process for considering biodiversity?</p> <ul style="list-style-type: none"> <li>Yes. Even though the section is very comprehensive there is further information that could be added. However this would result in</li> </ul>	<p>Comments noted.</p>

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		unnecessary detail, complexity and the risk of becoming out of date quite quickly. As a result it is considered that the correct approach, which is to refer to the relevant Institute etc, has been followed.	
		<p>Q17. Is the technical information in this section up to date and an accurate reflection of biodiversity in Crawley?</p> <ul style="list-style-type: none"> <li>• Yes. Our only minor comment is that 'Chartered' is missing from Chartered Institute of Ecology and Environmental Management in paragraphs 5.26, 5.35 &amp; 5.89.</li> </ul>	This has now been added to the SPD.
John Cooban	1.3	<p>Green infrastructure is a network of multifunctional and multidimensional space...</p> <p><i>Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, allotments and private gardens, parts of highway, railway, pathways, streams, canals and other water bodies, and all trees, landscape and wildlife-supporting features or structures associated with them. It can include buildings such as green roofs and walls, whether deliberately designed or by natural process. It includes all urban landscape, spaces, surfaces, underground substrates and structures that make positive contribution to ecosystem services, whether natural or designed.</i></p>	Comments noted.
	2.13 / Figure 1	<p>Fundamentally, there is no acknowledgement of the urban tree canopy cover – the urban forest – growing throughout the developed areas of the town – whether privately, publicly or statutorily owned. (Tree cover is one of the principal components of GI, yet CBC as planning authority has not engaged on the need for a Tree Strategy to quantify or evaluate this, as a basis for managing it through policy.)</p> <p>There are obviously some issues of clarity with areas of multi-layered designations even at the full scale of the 'accompanying detailed plan'. Tree canopy cover is another layer, but not one that should be omitted from a Green Infrastructure Map.</p>	<p>The benefits of increasing tree canopy have been included under para 3.1.</p> <p>Tree canopy whilst not a layer itself is part of the open space, structural landscaping, ancient woodland, tree preservation order/areas and biodiversity opportunity areas.</p>
	2.28	'Landscaping' is a vocabulary term adopted by planners that can still reflect slightly unfortunately on those that use it, in that it diminishes the concept and	Opinion Noted.



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		<p>appreciation of landscape as an art and science, to something which might be accomplished by a tradesman. 'Landscaping' is something that is done by a 'landscaper'.</p> <p>The word appears about 30 times in the document – sometimes referring to a policy or another document title which is already saddled with it. There is nearly always a better term; 'landscape' alone often covers it - if necessary supplemented by a word such as 'existing', 'proposed', 'design', 'scheme', 'work', 'measure', etc.</p>	
	Part 3	<p>Please check and make reference to attached NPPF Guide to tree and landscape clauses**.</p> <p>Headline: Trees are a material planning consideration.</p> <p>This part of the SPD needs to be structured to systematically cover the way in which trees are considered at all stages of the planning cycle:</p> <ul style="list-style-type: none"> <li>Asset evaluation / context</li> <li>Targets / objectives</li> <li>Methods / Guidance</li> <li>Statutory (TPO) protection (actionable only in the breach)</li> <li>Actual physical protection (through enforcement of Conditions)</li> <li>Monitoring / Enforcement / Review</li> </ul> <p>Early reference, including the use of its introduction in part at least, should be made to BS 5837:2012 in this section. Not only does it set the scene and refer to the benefits of trees in a GI context, but it also gives essential context to the use of the quality assessment categories A, B, etc. mentioned in 3.5.</p> <p>Reference to benefits of tree cover to human health and wellbeing could be added. (see e.g. Toronto tree study and others)</p> <p>The lack of any current evaluation of the overall town-wide tree cover asset should be acknowledged, together with a declared intention to rectify the situation through the implementation of a comprehensive (multi-ownership) tree strategy.</p>	<p>The benefits of tree canopy cover have been included in Part 3.</p> <p>The decision to create a comprehensive multi-ownership tree strategy is outside the scope of this SPD.</p>

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	3.3 / 3.4	<p>Heading should be Designing <u>for</u> trees; the fundamental point behind this is that it is about designing space for trees – both existing and proposed. Space for trees is more fundamental than mere numbers of tree stock. New trees are cheap, it is the space they (we) need that is seen as expensive, depending on the prevailing value system.</p> <p>Don't lose the authority of the headline message in the text as drafted ... <i>Trees are considered to be a material consideration where planning permission is required ...</i></p>	
	3.15	Throughout, use 'arboriculturist' as the correct term, not 'arboriculturalist' (see BS 5837:2012 para 3.3)	Both spellings seem to be common but to reflect the BS 5837:2012 this has been amended.
	3.19	Text should be amended to refer to inclusion of the whole of the BS 5837 page 38 containing Annex B and Table B1.	This has already been included under Submission Requirements.
	Consultation Question 12	<p>The following issues need discussion / inclusion:</p> <ul style="list-style-type: none"> <li>• Sanctions to deter preemptive felling.</li> <li>• GAL 13km aerodrome birdstrike safeguarding / anti-biodiversity measures as interpreted by CBC in respect of constraint on 'large' tree species, particularly where large trees will be increasingly important in mitigating environmental / landscape and visual impacts of Gatwick Airport.</li> <li>• Tree Strategy / i-Tree or equivalent surveys</li> <li>• Review period and SPD consultation procedure / community engagement for tree planning issues generally.</li> </ul>	Comments noted.
Ifield Village Conservation Area Advisory Committee		<p>From a lay point of view, this looks a carefully thought-out document and IVCAAC is pleased to see such a wide range of policies for the protection and enhancement of the green infrastructure. I am afraid we do not have the expertise to comment on much of the detail. Here, however are a few comments.</p> <p><b>Circular routes</b></p>	Comments noted.

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		<p>CH11 2.23. We endorse the importance of circular routes into the countryside at as many places in Crawley as possible. They are a valuable feature of Ifield Village Conservation Area and it would be a valuable asset if they can be developed at other places in the town.</p> <p><b>Q 15 Is further guidance needed on provision of open space?</b></p> <p><b>Noise</b> Noise in green spaces has only been mentioned with respect to noise from Gatwick. The peace of the countryside and of many green spaces in and around Crawley is spoilt by car noise. The proximity of the M23 and A264, particularly on the east and south side of the town produces a persistent 24 hour hum on that side of the town. Policies to restrict further road building to the west would enhance the preservation of the countryside there.</p> <p>Examples of noise pollution from car traffic are: Tilgate Park – the Peace Garden is not peaceful from a noise point of view. Worth Conservation Area is spoilt by the hum of the M23. Willoughby fields are spoilt by the presence of a race track having been built on Bonnets Lane – it is used at weekends and is <b>very</b> noisy.</p> <p><b>Accessibility to toilets.</b> The document refers to making green spaces locally available so that people can walk to them from their homes, but it acknowledges that this is not always possible. Where people come from a distance or are at a place for some time, there need to be toilet facilities. Ifield Village Green is an area which people come to for family picnics, to watch matches and to use the swings etc., but it has no toilets. Parks in the town all have toilet facilities.</p> <p><b>Bridleways</b> We would support any improvement of bridleways and their linking to rural footpaths, providing the footpaths don't become impossibly churned up. (p12 linking of bridleways with footpaths through Ifield Brook Meadows).</p> <p><b>CH9/ENV 3 – West of Ifield Rural Fringe and Local Green Space - restriction of airport parking?</b> We endorse the description of the West of Ifield Rural Fringe and Local Green Space and its link to the rural landscape on the Horsham side. We do not</p>	<p>Noise is a criteria of Policy CH9: Development Outside the Built-Up Area and also Policy ENV11: Development and Noise.</p> <p>Enhancements to Local Green Space that improve use/access are supported.</p> <p>Noted. Enhancements to public footpaths could include improving surfacing.</p> <p>Policy GAT3 of the Crawley Local Plan only allows new and additional parking on-airport. Horsham have a similar policy in their Local Plan. The council work with</p>

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		<p>know, however, if the Horsham Landscape Plan for this area includes restriction of Airport Parking. Such parking is beginning to encroach on this landscape – the most recent (and obtrusive) example being that at Ifield Court Farm.</p> <p><b>Ifield Brook</b> We would support any enhancement of Ifield Brook as it is an important feature of the conservation area. The maintenance of the river is essential as, sadly, rubbish gets dumped there from time to time.</p> <p><b>Finances and resources to implement the plans</b> One last question relates to whether the council has the resources and finances to implement these policies.</p>	<p>surrounding authorities to stop unauthorised parking relating to Gatwick Airport.</p> <p>This is an important element of the Green Infrastructure Map.</p> <p>Noted. The policies and guidance contained within the Local Plan places the onus on the developer to demonstrate that a proposal meets planning policy.</p>
Homes & Communities Agency (HCA)		<p>The HCA agree generally with the technical content of the document but would like to see a section on viability included. Suggested wording could be as follows:</p> <p><i>The provision of Green Infrastructure should be considered on a site by site basis. There may be instances where elements of Green Infrastructure provision is not physically feasible or financially viable. On marginal sites facing significant delivery constraints, the financial viability of a scheme may be called into question. Where this is the case, the applicant should enter into formal S106 negotiations with the Council and it may be feasible for some S106 requirements, such as the provision of some forms or open space or the ongoing maintenance costs to be reduced. Applicants should discuss S106 matters and scheme viability issues through the formal pre-application process at any early stage.</i></p>	<p>Comments noted. Provision of green infrastructure will be on a site by site basis and decisions made based on an understanding of viability to ensure realistic decisions. Where viability is demonstrated as an issue the council will look to be flexible in applying policy requirements, where possible.</p>
Mole Valley District Council		<p>Thank you for consulting MVDC on the draft Green Infrastructure SPD. I can confirm that MVDC has no objection to the content. However, I would like to bring the following factual issues to your attention.</p> <p>Paragraph 6.12 and Appendix 2 refer to landscape character areas within Mole Valley. This recognition that landscape considerations may cross local</p>	<p>Appendix 2 has been amended to reflect the Mole Valley character areas.</p>

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		<p>administrative boundaries is welcome. However, the reference on the map at Appendix 2 to an “unpublished Mole Valley LCA” is out of date. MVDC adopted a Landscape SPD in July 2013, a copy of which is included with this response.</p> <p>The part of Mole Valley adjacent to the Crawley Borough boundary is within the Open Weald landscape character area and section 5.4.1 of the Landscape SPD includes a Character Profile highlighting its key characteristics.</p> <p>More recently, a Surrey-wide Landscape Character Assessment has been published by Surrey County Council. This is available online:  <a href="https://www.surreycc.gov.uk/environment-housing-and-planning/countryside/countryside-strategies-action-plans-and-guidance/landscape-character-assessment">https://www.surreycc.gov.uk/environment-housing-and-planning/countryside/countryside-strategies-action-plans-and-guidance/landscape-character-assessment</a></p> <p>The Surrey LCA includes individual reports for the three Surrey authorities which adjoin Crawley, so could usefully be referenced as a source of information for assessment of cross-boundary impacts.</p>	
Thakeham Homes		<p>We support the comprehensive approach that has been taken so far in the preparation of the SPD. However, there are a number of aspects that, in our view, should be amended to promote an integrated, cross-boundary approach towards green infrastructure provision. In particular, we note that the SPD does not consistently account for strategic development in neighbouring authorities adjacent to the Borough boundary. In doing so, opportunities for a strategic approach towards green infrastructure provision across administrative boundaries are missed.</p> <p><b><i>Integrated Approach</i></b></p> <p>The SPD should adopt a strategic, integrated approach to existing and proposed green infrastructure, including where projects and networks cross administrative boundaries. Proposals should knit development together and help sites integrate into the wider area.</p> <p><i>“The strategic approach to green infrastructure may cross administrative boundaries. Therefore neighbouring authorities, working collaboratively with other stakeholders... may wish to consider how wider strategies for their areas can help address cross-boundary issues and help meet the Duty to Cooperate”</i></p> <p>Planning Practice Guidance, Paragraph 029</p>	<p>Comments noted. Consideration of allocating a site adjacent to Crawley but outside its boundary should include green infrastructure in discussions between Crawley, the local authority and the developer having regard to assessments of landscape character and other policy and guidance of both areas.</p> <p>Additional wording has been added to the end of paragraph 2.3 which now states <i>“This is particularly important for large proposals where there is greater scope for enhancing existing, providing new green infrastructure and creating links to/between existing green infrastructure, including opportunities beyond the borough boundary.”</i></p> <p>The Mid Sussex and Horsham Landscape Character Assessments, alongside which the Crawley Landscape Character Assessment, supporting the Local Plan and considered through the Crawley Local Plan examination, was undertaken, are referenced in the</p>

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		<p>The need for an integrated approach to green infrastructure is acknowledged within the draft SPD, which emphasises the importance of enhancing the connectivity of the network.  <i>“A key element of green infrastructure planning is taking opportunities, where possible, to create multi-functional green spaces to make the best use available land and to enhance the connectivity of the network.”</i></p> <p>Draft Green Infrastructure SPD, Paragraph 2.5                      The draft SPD also includes an acknowledgement of the importance of an integrated approach with regard to large projects, which should be linked with the existing green infrastructure network.  <i>“This is particularly important for large proposals where there is greater scope for enhancing existing, providing new green infrastructure and creating links to/between existing green infrastructure.”</i></p> <p>Draft Green Infrastructure SPD, Paragraph 2.4                      It is evident that the draft SPD has been prepared in the spirit of applying an integrated approach to existing and proposed green infrastructure, and has taken into account a number of large projects outside of the Council's administrative boundary. This includes, for example, clear landscape principles with regard to the development at Kilnwood Vale, which falls within the administrative boundary of Horsham District Council. In this context, the draft SPD states, “the guidelines relate to integrating the new development into the existing qualities of the urban/rural fringe” (Draft Infrastructure DPD, Paragraph 6.47). This is the correct approach, which serves to knit development together and to help sites integrate into the wider Green Infrastructure.                      It is our view however, that this approach is not consistently applied throughout the SPD, with the notable absence of the Pease Pottage strategic site in the emerging Mid Sussex District Plan. The Pease Pottage strategic site lies adjacent to the administrative boundary of Crawley Borough Council south of the M3, and is currently allocated for development within the Focussed Amendments to the emerging Mid Sussex District Plan. As such, we consider that the interaction of the Pease Pottage site with the wider green infrastructure should be clearly acknowledged and supported within the SPD. As stated in the SPD, the M23 acts as a barrier to pedestrian access to the countryside to the south. Whilst the Pease Pottage site is well contained, it provides an opportunity for landscape integration with Tilgate Forest, providing</p>	<p>appropriate Area/Edge sub-sections within Part 6: Countryside and AONB of the Green Infrastructure SPD, in particular, in relation to Pease Pottage, Edge 4 – South of Broadfield into Buchan Hill Forest and Fringes and Edge 5 – Tilgate/Worth Forest and Fringes.</p>

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		<p>improved recreational areas and connections between Crawley and the wider countryside.</p> <p><b>Landscape Character Areas and Edges – Edge 5</b>                      The emerging Pease Pottage strategic site lies within an area identified within the draft SPD as 'Edge 5 – Tilgate/Worth Forest and Fringes' and it is clear that the document has not accounted for the strategic site in its assessment. In particular, the draft SPD refers to the Mid Sussex Landscape Character Assessment, which was published in 2005 prior to the emerging District Plan and makes the following observation:</p> <p><i>“Whilst the M23 may act as a barrier to development spreading into this character area it also acts as a barrier to achieving the most positive use of this area of countryside”</i></p> <p>Draft Green Infrastructure SPD, Paragraph 6.60</p> <p>At Paragraph 6.63, the draft SPD also goes on to describe the landscape sensitivity of the area as 'medium to high', however it is not clear on what basis this conclusion has been made, as it is not described as such within the Mid Sussex Landscape Character Assessment. Similarly, the SPD should also recognise the degraded landscape quality around Junction 11 of the M23.</p> <p>As such, it is our view that the section of the draft SPD 'Edge 5 – Tilgate/Worth Forest and Fringes' should be revised to account for the Pease Pottage strategic site in the emerging Mid Sussex District Plan, thereby enabling a consistent strategic approach to green infrastructure in accordance with PPG Paragraph 029.</p> <p><b>Conclusions</b>                      The Green Infrastructure SPD should seek to improve connections between individual projects within and beyond administrative boundaries so that individual developments can be brought forward in the most appropriate way. As such, we consider that significant strategic sites such as Pease Pottage should be considered carefully as part of the ongoing work on the SPD, with clear principles for landscape integration.</p>	
Environment Agency		<p>Biodiversity                      To ensure that development, including energy generation, positively contributes to the Water Framework Directive, and it's clear that the use of</p>	<p>The approach to biodiversity and water is set out in Part 5 and table 8. Watercourse are a habitat of principle importance that require ecological assessment setting</p>

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		<p>SuDS, and appropriately buffering watercourses from development, contributes to the River Basin Plan.</p> <p>If these issues are adequately covered in green infrastructure documents, they should be cross referenced within your document.</p>	<p>out the impacts. Where harm is likely evidence must be submitted to show how alternatives designs or locations have been considered, how adverse effects will be avoided wherever possible, how unavoidable impacts will be mitigated or reduced, and how impacts that cannot be avoided or mitigated will be compensated.</p>
Colin Maughan		<p>Thank you for sending me your letter asking for my comments on this recent document. As with the previous one which I read in March, I am too busy at the moment to deal with this one as thoroughly as I should like. The provision of a list of consultation questions is very helpful, and if I have time I will answer them. I will see how it goes, on my second reading of your report.</p> <p>1. As there is so much about trees in this particular report I wonder whether you could state why they are important – possibly because, in Crawley’s case, it was designed and built in the spirit of the Garden City movement. And this set of remarkable documents provides a maintenance manual for the town, and a guide to its development. It might surprise you and your team to hear that where I live my neighbours, and their insurance companies, regard trees as a dangerous nuisance, so many have been lost.</p> <p>When I came to live in Crawley and the council had its own gardeners the manicured standard of care, including large herbaceous borders, was remarkable. This possibility of labour intensive care apparently became impractical, but a less demanding regime still works reasonably well at this time of the crisis brought on by the banking industry.</p>	Comments noted.
		<p>One aspect that hasn’t been mentioned so far is that at what may turn out to be the end of the Modernist Movement in design and architecture, with its sometimes uncompromising use of concrete and flat roofed buildings, mature trees and wall covering creepers provide a softening and humanising contrast. The former design school atrium and the Bauhaus teachers’ housing in Germany, and the Telford New Town here are good examples. This use of mature trees near buildings requires careful management in the long run of course, and the careful choice and siting of the trees initially.</p>	Guidance on siting of trees in relation to buildings is set out the Designing with Trees section.
	Page 7	<p>2. It is only a small editorial point but I was initially a little mystified by the word “applicants” in the main heading on page 7, because the report as a whole isn’t</p>	Noted. Heading has been amended to be more general.



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		only aimed at developers and home owners seeking planning permission. I see it, as I said above, as a working manual.	
	Paragraph 2.8	3. In 2.8, "Delivering green infrastructure benefits" seems to imply that rising maintenance costs will have to be afforded. In a world run by accountants, and in Crawley's case at the moment, under West Sussex County Council's parsimonious thumb, I hope that the necessary funds and additional labour will be available when required.	Noted.
		4. I don't think there is any mention of the use of some evergreen shrubs and trees (Holm Oaks for instance) to brighten the winter scene a little, after deciduous trees have shed their leaves. Neither is it mentioned that after the current generation of untrained "tree surgeons" have reduced many handsome deciduous trees to unsightly stumps in and around Crawley, they are even more unsightly when leafless in the winter.	Noted. Advice on tree species has been included, particularly the use of native species.
	Paragraph 2.8	5. 2.8 talks about "protecting and enhancing heritage assets". In Britain, and especially in Crawley since I have known it, for the last seventy or more years, old buildings have been crudely altered or removed completely one by one, so that there isn't much left. Having seen the sound original Crittall windows removed from the New Town shops and offices south of the former Peacocks' shop in the Broadway, and the canopies removed from the old Tesco's shop in Queens Square, I fear for the future of the New Town centre. The economic migrants from Poland, Hungary, Bulgaria and our more prosperous friends from France and Germany are surprised and disappointed to find how we do not care for our heritage compared with their home countries. As you know, at the time of the Ottoman Empire and during World War Two many whole cities were destroyed, and then carefully rebuilt as soon as peace came. In fact, some French towns and cities were destroyed and rebuilt twice – after both world wars. Here Sheffield, Liverpool, Bristol, Leeds, Birmingham, to mention five of our key cities have been ruined during the war and since, and remain as unsightly monuments to the efforts of developers and traffic engineers. London's development is now out of control, with a boom in development of offices and flats. As in Birmingham and Barcelona, many of them will probably never be occupied. At least in Crawley some empty offices are being	Comments noted.

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		converted into flats. Let's hope people can afford the rents, and increase the footfall to keep some shops staying in business.	
	Paragraph 2.10	6. In 2.10, the report speaks of "applicants and developers engaging with the council" – as the would-be developers have done on the redevelopment scheme for Crawley Railway Station, recently. Everyone concerned though, needs to know that there are hardly any good architects working in this country – a situation made worse by undue reliance on the computer programmes, which allow any fool to design a building. Another example, of flats over shops, is coming soon, opposite the car park at the southern end of the Broadway. It may turn out well if the design of the balconies can be improved.	Comments noted.
	Paragraph 2.5	7. 2.15 mentions "community orchards" unexpectedly and I wondered what they are, or will be, in future.	More information on community orchards can be found here: <a href="https://www.gov.uk/government/publications/community-orchards-a-how-to-guide">https://www.gov.uk/government/publications/community-orchards-a-how-to-guide</a>
	Paragraph 2.17	8. 2.17 deals with poorly planned open spaces – poor maintenance is presumably a component of unrealistic planning. The boxwood hedge around the lovely giant pebbles (ruined by garish engraved lettering done by two of CBC's misguided artists) appears not to have been cleaned since it was installed. I can't explain it, but a generation of Crawley people celebrate the availability of drinks in cans, and fast food in cardboard boxes, by throwing these containers and their contents all round the town. When asked why they do it, when there are numerous litter bins, they usually say it provides people with work to clear up the mess they have made.	Noted.
	Paragraph 2.20	9. 2.20 is concerned with replacing failed planting. I have never seen this done successfully anywhere, especially in Crawley. The failure is due to a lack of maintenance, the purchase of poor quality trees (sometimes from a Welsh firm recorded in my blacklist and sometimes from Barchams *phone number provided), unsatisfactory staking, and vandalism. The local examples are the trees planted to stabilise the imported soil used in making the hole near the golf course buildings in Tilgate Forest. About half of them have failed – and the hawthorn trees planted near Vines BMW showroom to replace an avenue of mature willows in Haslett Avenue. They were all snapped off by vandals soon after planting. Why were large urban trees cut down? Why were they replaced	Noted. As the SPD sets out, failed trees are required to be replaced via conditions and maintenance details required. The tree policy requires planting of an appropriate sized tree from the outset.

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		by small trees like hawthorns? Why have all these trees been lost due to lack of maintenance and making good vandalism?	
	Paragraph 2.22	10. 2.22 "management of wildlife" reminded me of Ken Livingstone, who was unpopular when Mayor of London, for getting rid of the pigeons – someone leaves piles of bread on the grass for Crawley pigeons outside the Roman Catholic church. As you probably know, there are about 40 pigeons living in and around the bus station, and I am not sure that they should be encouraged. What is CBC's policy on possibly unwelcome wildlife I wonder?	This is outside the scope of the SPD.
	Paragraph 2.22a	11. In 2.22a under "Planting and establishment" there is no mention of coppicing and pollarding, and I wonder whether this urban treatment of trees should be encouraged in Crawley, as it is in France. I think they are mentioned in passing later – without comment (see .22e and .22g)	Coppicing and pollarding are included in the landscape management and maintenance section under information required for a landscape management plan.
	Paragraph 2.22b	12. 2.22b mentions "removal of tree guards and tree grill sections", but doesn't explain why they are removed, and whether they are put back. It also mentioned "inappropriate new paving". This is a sore point, as Crawley has large areas of bogus concrete brick paving which looks cheap, and weathers badly. Horsham Borough Council is more popular because it has put in stone setts, which may never have been there originally, but look handsome and wear well. More worryingly, they put in, in the past, concrete reproduction work York stone on pavement areas. These slabs trip pedestrians, especially in icy winter conditions. See enclosed articles on the late Ian Nairn, who particularly grumbled about cheapjack firms selling concrete paving bricks.	Comments noted. Paving is outside the scope of this SPD.
	Paragraph 2.22c	13. 2.22c deals with water features. Not so long ago Crawley town centre had three fountains in the Martletts, near the County Mall side entrance. They were removed and given to a local school because the public threw rubbish into them. CBC's short memory has unfortunately unwisely agreed to have fourteen(?) new fountains in Queens Square. Perhaps the public's behaviour has changed for the better. In Horsham though their disagreeable "globe" sculpture fountain has been switched off, and boarded over with sheets of hardboard. They still have questionable stream with small waterfalls working, and nearly rubbish free.	This is outside the scope of this SPD.

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		14. The council would be better advised to avoid buying any more public sculpture as, like architects, there are hardly any good artists working now. Richard Quinnell's bird sculpture which has been moved unfortunately to the Library. It is the exception. The Saatchi Gallery and Goldsmith's college are largely to blame for the poor work artists do now. There are also "artist blacksmiths", unfortunately Quinnell also made the lovely gates to the Globe Theatre in London. He is a good smith.	This is outside the scope of this SPD.
	Paragraph 2.22g	15. 2.22g refers to British Standard 3998 on trees. It may have improved but it used to be sound but only a brief guide. I will see if I have anything more thorough.	Noted.
	Paragraph 2.25	16. As far as I am aware there are no signs at Three Bridges Station to the Worth Way, and the Sustrans route for cyclists from the Station to Pease Pottage via Tilgate Forest is unduly tortuous and badly signposted – like most or all the cycle paths in the Town Centre (see page 64 "Area Objective" in the grey box).	This issue is raised in para 2.27.
	Paragraph 2.27	17. In 2.27 it states "the urbanism of prows..." what are they?	Public Rights of Way. The lower casing of this acronym has been amended to reflect the previously abbreviation following the initial reference, which will hopefully clarify the reference as the same.
	Paragraph 3.3	18. 3.3 mentions "expert advice", but living in a conservation area, where there are two key linden trees that give Linden Close its name, I have been trying for some time to get tree preservation orders on them, but have been unable to get any cooperation from either Crawley or West Sussex councils. It is only a question of time (by next autumn) before one or both are converted to unsightly stumps or completely cut down by county tree surgeons, Danny Beadell, Holly Tree Surgeons Ltd (the three splendid London Planes they pruned recently still don't have any leaves due to their haircut, but they <u>may</u> survive) or another incompetent firm. Total Tree Care in Horsham might be good, but as Surrey has even more trees than Sussex there will probably be better tree surgeons there still. Ours should be sued for vandalism. I plan to contact some arboriculture advisors such as Capel Manor College in Enfield and Michael Volp in Norwich City Planning Office (again) who worked on the	Comments noted.

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		current BS3998 publication, with its 76 pages, and costing £182.00. I am not holding my breath, because many such organisations – like the Guild of Master Craftsmen and the Royal Society of British Architects, are spurious money making rip offs.	
	Paragraph 3.11	19. In 3.11 the addition of the word “financial” to “contribution” would clarify the statement.	Noted – the word “financial” has been added to clarify.
	Paragraph 3.12	20. Tree planting by Crawley Borough Council – doesn't West Sussex Council do any tree planting? “Ensuring that new tree stock survives” (see my comments in 9 above).	Comments noted.
	Paragraph 3.14	21. In 3.14 the number of trees required as replacements seems over generous. It used to be said that CBC's policy was to replace each lost tree by two. In reality, in my experience, no lost tree has been replaced, and one new memorial tree outside the Tilgate Golf Course buildings has unwisely planted under another tall mature tree. It will not prosper in that position.	Comments noted.
	Paragraph 3.41	22. The mention of the Forestry Commission in 3.41 reminds me that they cannot be trusted to take care of forests. The controversial conversion of Tilgate Forest into a golf course when there was sufficient provision (at Copthorne for instance) was followed by total neglect for thirty or more years. Recently, the remaining trees, which should have been thinned out periodically, have been done by a contractor using much too large vehicles and machines, during a too wet season. This made the good Forestry Commission roads impassable to cyclists, walkers, golfers, runners and dogs, and ruined the roads. Months later the damage has not been repaired. In fact, the holes have been filled with large grade gravel, which is as bad or worse than mud and water, and the materials dumped for proper repair remain unused. Presumably following American National Forest Practice much or all the detritus (tree and shrub) has been left for the benefit of insects and animals. I don't know yet who the contractor was, but the mess left everywhere, including plastic pipes is shameful. A sign near the golf clubhouse states that the county's tree officer inspected the site twice, and found the work satisfactory – the managers of the Golf Course – Glendale are mentioned. I visited the site twice and the shambles is disgraceful. Apart from one area, where trees have been felled unnecessarily, or by mistake, the thinning is	Comments noted. Felling licencing is outside the scope of this SPD and the planning system.

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		satisfactory. As with the work of a well trained tree surgeon, it should look as it was found when thinning is done properly, I will find out who the contractors concerned were in this case. They and the (remnants of) the Forestry Commission should be ashamed. For the time being traffic noise from the motorway and has increased due to the reduction in tree cover. This was unavoidable and, in time, there will be a little improvement as the unduly slender trees fill out. I wonder if Crawley Council's tree officer Russell Spurrell has any hand in this example of poor tree management and inconvenience to the public.	
		23. While I think of it, I should like to point out that what signing there is in Tilgate Forest is very unsatisfactory. As on pages 69 and 70 the appendices and in this series of report the heavy-handed use of large, bold capitals sets an unduly authoritarian, undemocratic tone reminiscent of police states. "If in doubt use lowercase letters" is always a sound principle on signs and printed matter.	Noted.
		24. The contemporary trend to fence off schools, flats and formerly fenceless, hedgeless front gardens in housing areas, is a sign of a breakdown in neighbourliness and community, as personal wealth and the significance of the consumer role increase. Self interest, selfishness and a narcissistic outlook in the public is growing, as seen in the mindless use of mobile phones.	Noted. This is outside the scope of this SPD
		25. Similarly, I should have said that living on an urban island in an attractive rural area, in spite of the provision of sound and generous leisure facilities and events, there is a danger that children will not benefit from forestry, agriculture and wildlife if they are sealed into hermetically sealed Chelsea tractors. By contrast, in Hungary or Romania, children have their own railway line to run (with some adult assistance), and develop a pride in their work and the responsibility. Here, they remain children.	The Local Plan and SPD includes requirements and guidance on improving/creating links to the countryside.
		26. Due to the very unfortunate rise in the cost of housing (I think in Henry VIII's time it was 10% of people's incomes) multiple occupation is a growing trend. Rising middle class incomes and the absence of interest on savings, is leading to buying property to let. This also often results in multiple occupations and family housing being converted into flats. As a result, more and more front gardens are paved over to make car parks, often four or five cars. This relieves	Guidance on paving front gardens is here: <a href="https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance">https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance</a>

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		the narrowing of roads, and the damage of grass verges, but in heavy downpours of rain roads flood due to the reduction in soil permeability. Planning permission needs to be sought to do this.	Preventing loss of front garden areas is outside the control of the planning system.
		27. When considering the welfare of wildlife, the cat population is a threat, especially to birds, and it should be remembered that trees and shrubs provide them with shelter. Permission for cats?	This is outside the scope of planning policy legislation.
		28. There are a number of approaches to management of the built environment and green space, varying from cheese-paring neglect to perhaps unduly over managed sterile perfection, in the Swiss and Scandinavian tradition: neglect and minimal rubbish clearance; labour intensively programmed frequent street cleaning and rubbish removal; minimal intervention in managing green space and trees and shrubs taking into account the flowing season of wildlife – public safety being the only consideration; Forestry Commission's present policy of using Natural Forest Practice with mixed species of trees and some felled timber left to encourage wildlife occupation; a military approach to the management of green space and woodland – a labour intensive regime of a highly managed natural environment – the gardener's methods of achieving apparent perfection at all times; the illumination of buildings and key open spaces, as in Table 8 (page 43) is possibly obsessional and showy for people who live a relaxed, varied existence and not relying on tourists' approval.	Comments noted.
		29. The list above introduces the problem of keeping a balance between the environment in general as a living and leisure area, and a working/industrial one. The Scandinavian and (probably) Dutch approach to planning differs from ours in the UK in not dividing the environment into watertight zones. This is more interesting to visit and live in, but probably difficult to manage. I used to visit a friend in London with a flat over a 24hour baking factory, and our sleep was intermittent.  The balance can be found in Midhurst's efforts to reduce the loss of amenity as the nearby stone quarry's homes grow larger and prove to be a threat to a safe and comfortable life in the town centre. Similarly if the size and activity in these industries – factories, scrapyards, airports etc. grows there is eventually a change from them being welcomed as sources of employment within easy	Comments noted.

**GREEN INFRASTRUCTURE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		reach of homes, and sometimes, like the chalk quarries in Lewes, landscape features, to the traffic jams and unacceptable noise characteristic of large airports like Heathrow. Planning controls become essential before environmental standards cannot be restored, and houses cannot be sold, and residents are depressed.	
	Table 8, Page 42	<p>It would be interesting to see Dutch planning legislation, especially in relation to protecting wildlife. Where much of the agricultural land has been reclaimed from the sea (as it has also in the Fens) it is highly valued, being hard won, and in many areas there are no hedges, green verges or footpaths, and grow up to the edge of roads.</p> <p>Incidentally, industrial methods of farming, monocropping and the factory farming of animals leads to loss of landscape quality and soil fertility. This is probably not relevant to this report, apart from questions of water management and flooding, trees being very important in the reduction of damage caused by the latter. See Table 9, which deals with the town's landscape periphery.</p>	Comments noted.
	Paragraph 5.44	Plant species being invasive does not deal with ivy which in Crawley is increasingly being allowed to kill more or less sound trees (*officially it is not parasitic but it spreads from tree to tree through its underground root system. Sometimes it takes trees' bark off), presumably in order to shelter insects and birds. Good, healthy trees provide this service in summer at least. Bamboo, which I inherited in my garden, is surprisingly invasive – it will grow through concrete and tarmac unless well managed, and should not be specified in an unguarded moment.	Comments noted. Ivy and bamboo is not currently considered invasive species in the UK.
		32. Invasive animal species such as jays, magpies, squirrels and rats seem not to be mentioned. Grey squirrels for instance often severely damaged trees, and sometimes infest houses, especially attics.	Control of invasive animal species is not covered in relationship to development in national legislation.
	Paragraphs 6.27 and 6.31	33. Gatwick Airport, the rural fringe and green space between Crawley and the airport. When Yorke, Rosenberg and Mardell were the architects and consultants, there was an enlightened policy of keeping a firm boundary between the airport and the surrounding farmland, as is the case with the town of Crawley itself. Largely, this still applies, and should perhaps be formally recorded in this series of planning reports. Heathrow Airport, by contrast, has	The importance of maintaining the distinct identities of Gatwick and Crawley are covered in the landscape Character section: Upper Mole Farmlands Rural Fringe.



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		been allowed to sprawl, and incorporate nearby villages, resulting in a sad, dramatic loss of environmental quality, and amenity for local people.	
	Paragraph 6.47	<p>Kilnwood Vale has something in common with Heathrow Airport and is a housing desert rather than a village. Presumably its design has something in common with the unconvincing “vernacular” housing in Prince Charles Poundbury, and the Essex housing guide. It has given the large scale housebuilders a freehand to build caricatures of Voysey Gertrude Jeckyle’s Godalming house, and increase rock bottom agricultural land values.</p> <p>As there is no infrastructure apart a bus service which nobody uses, as they are dyed in the wool motoring commuters, there are already more traffic jams on Crawley’s periphery roads and roundabouts as a result of such banal developments. The result is that we are reminded of how well the New Towns were thought out in the 1940s. This seldom recognised and respected.</p>	Comments noted. This is outside the scope of this SPD.
	Page 66, Paragraph 6.74	6.74, page 66, mentions Crawley’s remaining listed buildings. Some years ago CBC commissioned a report on its old buildings, but it has never been published, and the buildings are not easy to find because they are now amongst the younger New Town housing. People living in listed buildings might have reservations about undue intrusion of the public, but it is a shame that these attractive buildings are a hidden heritage.	Listed Buildings are not specifically covered in this SPD but the council’s policy is set in the Local Plan as Policies CH15/16.
		<p>As I said above, I have read through the questionnaire on page 76, and I think I have dealt with much of it already. As with all the previous documents you have done, it is quite remarkably thorough and sound. Would it be possible to get it published?</p> <p>All being well, if I can find them, I would like to enclose copies of several articles by/about Ian Nairn. Unfortunately, I didn’t know him, in spite of being very familiar with his work. I did know his contemporaries, Nicholas Pevsner, Richard Reid, Kenneth Browne, Gordon Cullen, Bill Slack (of the “Architectural Review”) and Michael Middleton editor of “House and Garden” and later of the Civic Trust (under Duncan Sands). This 1950s and 60s period was a Golden Age in terms of what you and your team have achieved.</p> <p>And I will try to find my signing that I did for Wimbledon and Putney Commons. As you will probably know, until Bisley was established as the primary, largely</p>	Comments noted.

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Respondent	Para/ Page no.	Comments	Council's Response
		<p>military, shooting ground, it was on Wimbledon Common. The neighbours complained about the noise so a more isolated site was eventually found. Nevertheless, the regime who ran the common as Rangers were still quite military in outlook when we were the landscape consultants.</p> <p>Incidentally, I heard at the weekend, via a CBC mole, that the exGatwick Racecourse bandstand is to be scrapped and a new one has been ordered for erection in the Memorial Gardens. Partly because it was probably restored when it was moved some years ago from the other end of Queens Square, it proved to be in remarkably good condition when it was dismantled by your good Newdigate contractors. I hope this new bandstand news report is untrue. There are a few wrought iron flowers missing. I am probably not going to be happy with the new Queens Square, but I <u>have</u> located the handsome discarded Crawley clock and clock tower, rusting in a farmyard nearby.</p> <p>With best wishes, and a job very well done.</p>	
Sport England		<p><b>Q1:</b> Do the topics identified cover the main areas requiring additional guidance? The Green Infrastructure SPD may, depending on its scope, incorporate some outdoor sports facilities. SPD scope should cover all forms of outdoor AND indoor sports. Some GI plans only incorporate informal outdoor sports (excluding MUGAs, tennis courts etc.), some include playing pitches (some not) and by its nature it will exclude indoor sports facilities such as swimming pools and sports halls which are key community infrastructure. Sport England would advise that either the scope of the Green Infrastructure SPD should incorporate all outdoor sports (informal or formal) and indoor sports be considered within a wider community infrastructure SPD or a separate SPD be prepared to address comprehensive sports infrastructure provision?</p> <p><a href="http://sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a> To ensure the SPD is sound it should be underpinned by a robust and up to date needs assessment. Sport England provide methodologies for such work to assist LAs in preparing such assessments and strategies (e.g. 'Assessing Needs and Opportunities Guidance' that replaces PPG17 Companion Guide in relation to formal sport and the 'Playing Pitch Strategy Guidance') and provides some free data on our 'Active Places Database' regarding many important key sports facilities to again assist as it includes some analysis tools. Other</p>	Comments noted. The council have an up-to-date Open Space, Sport and Recreation Study which will be updated periodically. The need to include built facilities such as swimming pools and indoor courts will be considered.

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		<p>modelling tools, the 'Facilities Planning Model', are available should this be useful in assessing need and supply or testing scenarios (please see below for more information). I note Crawley has a PPS in place, dated 2013. It will be important to ensure this is still up to date to form a basis for the SPD. Has it been reviewed and monitored on an annual basis? Has there been much change in either the supply or demand since the data was collated and assessed? If the answer to this is no and yes then it is likely that it will be ready for a review in 2016.</p> <p><a href="http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p>	
		<p><b>Q3:</b> Are there any additional topics which haven't been identified as a Supplementary Planning Document which the council should consider? Built sports facilities (see above).</p>	Noted.
		<p><b>Q5:</b> Should any of the policies be addressed in a different SPD to that identified in the table? ENV4 and 5 would include both outdoor and indoor sports provision but the existing list of SPDs appears to exclude built sports facilities.</p>	Noted.
		<p><b>Q7:</b> Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley 2030) that haven't been identified which should be considered for inclusion in one of the SPDs? See above re built sports facilities.</p>	Noted.
		<p><b>Q9:</b> Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage? Yes. In terms of design our main objective is to ensure new development or regeneration proposals encourage and provide more opportunities for physical activity. In supporting LAs with this Sport England and Public Health England have recently launched a guidance note called 'Active Design'. I would promote this guidance to you, to be incorporated/reflected in the Design SPD to support the objective of seeking to improve community health through planning (see link below):</p> <p><a href="http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p>	Comments noted. This has been incorporated into the Urban Design SPD.



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V:\SOUTHAMPTON\DATA\URBAN DESIGN\JOBS\WPL 43023 - Wilky - Gatwick\B] Drawings\NDD\Site Boundary. 25/07/15.



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project Gatwick Green  
 client The Wilky Group  
 date 25/07/2015  
 drawn by N-1  
 checked by SF

drawing Potential Masterplan Area  
 job no. WPL 43023  
 drawing no. 38002  
 rev -

scale 1:1000 @A4



\* Plan attached to The Wilky Group representation received.

**Trees in the Townscape – A guide for Decision Makers (TDAG)**  
**Arboricultural Association Roadshow, November 2012**

**National Planning Policy Framework**, published March 2012

Download full document from:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf>

**Key clauses of potential relevance to landscape and trees**  
Information prepared by Ian Phillips

**NOTE – The references below are only intended as a signpost to some of the content of the NPPF and are generally paraphrased or simplified extracts. Reference should be made to the original source document and the full wording and context of each clause in all cases. No reliance should be placed on the wording below without such further reference.**

**NPPF - Building a strong economy**

- S21- identify priority areas for environmental enhancement
- S28 -Plans should respect the character of the countryside
- S52 – New settlements may follow principles of Garden Cities
- S53 - Resist development of residential gardens

**NPPF on design**

- S58 - Positive references to landscape design and incorporation of green and other public space
- S59 - Local quality standards, strong sense of place, local distinctiveness – use of design codes
- S61 - Respond to local character, integrate into natural, built and historic environment
- S64 - Refuse permission for poor design

**NPPF – Promoting healthy communities**

- S69 - Safe and accessible development and high quality public space
- S74 - Protection of open space and playing fields unless surplus or replaced with better
- S76 - New designation of 'Local Green Space'

**NPPF – climate change and flooding**

- S94 - Proactive strategies to mitigate and adapt to climate change
- S96 - New development to take account of landform, layout, orientation and landscaping to minimise energy consumption
- S97 - Maximise renewable and low carbon development but address adverse impacts, including cumulative landscape and visual impacts.
- S99 - Long term risks to be managed through adaptation measures, including green infrastructure

**NPPF – natural environment**

- S109 - Protect and enhance *valued* landscapes
- Recognise benefits of ecosystem services
- Minimise impact on biodiversity and seek net gains
- S110 - Prevent pollution
- Remediate poor quality land
- Develop land of least environmental value
- S113 - Set criteria based policies to test development against wildlife, geodiversity and landscape and establish hierarchy of international, national and locally designated sites
- S114 - Strategic approach in Local Plans for creation, protection, enhancement and management of networks of biodiversity and green infrastructure

**NPPF – natural environment**

- S117- Plan for biodiversity at landscape scale across boundaries
- Identify and map ecological networks – international, national and local sites; corridors and stepping stones and areas identified for habitat creation or restoration
- Preserve, restore and re-create priority habitats, link to targets and identify indicators for monitoring
- Specify types of development suitable for identified Nature Improvement Areas
- S118 - Refuse permission for development resulting in loss or deterioration of irreplaceable habitats
- S123 - Protect areas of tranquility
- S125 - Limit impact of light pollution

**NPPF – local plan making**

- S152 - Seek net gains in economic, social and environmental dimensions. Adverse effects to be avoided, mitigated or compensated.
- S156 - Local plans to set out strategic priorities to include strategic policies on:
  - transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy
  - health, security, community and cultural infrastructure and other local facilities
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape

**NPPF – local plan making**

- To include:
  - S157 - Clear strategy for enhancing natural, built and historic environment and supporting Nature Improvement Areas
  - S165 - Sustainability appraisals
  - S170 - Landscape character assessments
  - S171 - Health and wellbeing
  - S177 - Infrastructure together with development

**NPPF - Collaborative working**

- S178 - Duty to co-operate across administrative boundaries, especially for strategic priorities
- S179 / 180 - Collaborative working, joint policies and strategies, consultation with LEPs and Local Nature Partnerships

\*\* Guidance attached to John Cooban representation received.