

CRAWLEY BOROUGH COUNCIL

Regulation 18 – Consultation Statement

Town Centre North – Revised Supplementary Planning Document

January 2009

CRAWLEY BOROUGH COUNCIL

Regulation 18 – Consultation Statement Town Centre North – Supplementary Planning Document

1. Introduction

- 1.1 This Statement has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 and Planning Policy Statement 12 Local Development Frameworks, and the procedures outlined in Crawley Borough Council's Statement of Community Involvement.
- 1.2 This Statement addresses the requirements of Regulation 18 (4)(b), outlining the consultation that Crawley Borough Council has undertaken in the preparation of the Revised Supplementary Planning Document (SPD) for 'Town Centre North (TCN).'

2. Initial Community Engagement

- 2.1 Early work which led to the allocation of the TCN site for a comprehensive, retail-led, mixed-use development in the submitted Core Strategy, and subsequently the preparation of the SPD document commenced in 2000. The first consultation on the emerging proposals was on the first stage Feasibility Study. This consultation included a 'Crawley Town Centre - Into the Future' leaflet which identified potential Town Centre development opportunities and went out to key stakeholders in the Town Centre, including the Town Centre Forum. This led to full public consultation on the Borough Council's draft Town Centre Strategy in July 2002. Both documents identified the TCN area as an opportunity site with the potential for mixed-use development. The consultation on the Strategy included the distribution of 2,500 leaflets, including 350 to Business Panel, 450 to CADIA members and 350 to voluntary groups with the CVS newsletters. 200 copies of the Town Centre Strategy itself were sent out to statutory consultees, major stakeholders and agencies such as the Chamber of Commerce, TAG, Central Crawley Conservation Areas Committee, with an additional 42 copies of the Strategy document requested. Over 400 letters, together with copies of the leaflet, were sent to owners of properties within and adjacent to the new development opportunity sites identified in the Town Centre Strategy. An Exhibition was held in the Town Hall Foyer, the Hawth Theatre and County Mall. An article was placed in the Crawley Live magazine, which was sent out to all residents in the town and included a feedback form. The leaflet, plan and Town Centre Strategy document were also available on the Council's Web site, which included a feedback form for comments.
- 2.2 Overall, the draft Town Centre Strategy was supported, including the potential for the growth of Crawley, provided that need was identified and the impact on other towns was taken into account. Major expansion, including a quality department store, was felt to be complementary to existing retailers. This Strategy remained in draft form, due to the emergence of the Local Development Framework, and was not progressed by the Town Centre Partnership.
- 2.3 In October 2002, the Borough Council appointed CB Richard Ellis (CBRE, previously CB Hillier Parker) to undertake a full, detailed feasibility study for

the TCN site. This aimed to identify the most appropriate area of land and assessed the commercial viability of a mixed-use scheme. Focus groups were held during this process to gain feedback from the local community on early proposals for TCN:- two groups consisted of local residents recruited via the Crawley Citizens' Panel, and two consisted of local businesses recruited via the Business Panel. The proposals were also discussed at a meeting of the Crawley Youth Council. All the groups were generally positive about the proposals and also supported increasing residential development, including more affordable housing in the Town Centre. Increasing traffic and congestion was raised as a concern, and the groups felt more varied nightlife should be encouraged. Concern was also expressed about the impact of the scheme on Queens Square.

2.4 In November 2003, widespread public consultation was undertaken on the illustrative Masterplan emerging from the study and on the emerging principles which would subsequently feed into the Borough Council's draft Development Principles Statement. The consultation comprised the following:-

- 9 -day exhibition with model in County Mall
- Exhibition and Model on display in Planning Reception at Town Hall
- Article in Crawley Live sent to all households
- Press Releases
- Two evening exhibitions for landowners, residents in the immediate vicinity and stakeholders. These included all members of the Town Centre Forum, the Urban Transport Forum and the Crawley Together Local Strategic Partnership
- Discussion with the Crawley Central Areas Conservation Committee

Presentations to:-

- LSP Conference.
- CADIA Development Group
- Chamber of Commerce
- Horsham District Council Development and Transport Advisory Group

2.5 Over 3,500 leaflets were distributed during the consultation period, mainly at the exhibition in County Mall but only 95 written responses were received. The feedback received again demonstrated overall support for the proposals, but stressed the need for traffic modelling and reiterated the need for an assessment of the potential retail impacts on neighbouring towns within the sub-region.

2.6 Following the conclusion of the Feasibility Study into the TCN development and the consultations described above, a draft Development Principles Statement (DPS) for Town Centre North was prepared in 2004. The DPS took into account the Masterplanning principles established during the Feasibility Study and the comments received during the wide-ranging public consultation on the Masterplan in November 2003. In 2004, consultation on the DPS for the Town Centre North site was targeted towards key stakeholders. These included landowners on the site, occupiers and residents in close proximity to the site, Town Centre stakeholders such as County Mall, Members of the Urban Transport and Town Centre Forums, The Chamber of Commerce, and statutory bodies such as the Police and Utility Companies. All those who responded to the consultation on the Masterplan

were also consulted. Once again there was overall support for the proposals. However, key issues raised included the impact on neighbouring town centres, traffic issues and concern from landowners about the impact on their properties and services. Also, the Utility companies wanted reference to the capacity of their services to be added. The Council included reference to the need to liaise with the Utility companies, and the need for retail capacity work and transport assessment work to be undertaken to support any planning application, and resolved to adopt the DPD in October 2004.

- 2.7 In order to address the concerns regarding retail capacity, and to support the emerging Core Strategy which allocated the site for Town Centre North, CBRE was commissioned in 2005 to undertake a new Crawley Retail Capacity Study. In May 2006, at Submission Stage of the Core Strategy, GVA Grimley undertook a retail impact assessment to consider whether the scale of the TCN development is appropriate for Crawley's current and future needs, and to assess the potential impact on neighbouring centres. Both studies concluded that, as the retail proposed in TCN is not replicating the neighbourhood centres, any claw-back would be from major centres some distance away and the impact on neighbouring centres should not give rise to any significant cause for concern.

3.0 Consultation on the original TCN SPD under Regulation 17

- 3.1 In October – November 2006, Crawley Borough Council sent out a Key Issues and Options Supplementary Planning Document (SPD) on “Town Centre North”, to key stakeholders, residents and occupants within the TCN boundary, community groups, utility companies, statutory agencies and Council Members. The Document and the Sustainability Appraisal Scoping report were also deposited in the Town Hall and the two libraries in Crawley, and were also available on the Council's web-site for a four week consultation period. As a result of this consultation, 23 representations were received. These included concerns about the inclusion of certain sites within the TCN area, and the impact on neighbouring Town Centres. These issues were considered by the Inspector when examining the Core Strategy allocation of TCN. Other comments which were addressed in the Draft SPD included the need for a Transport Strategy, Travel Plans and Transport Assessments to support the planning application, the need to liaise with the Thames and Southern Water, the need to refer to flood issues and the need to keep landowners and businesses informed during the planning process.
- 3.2 The Council then formulated the Draft SPD and published it for consultation for a 6 week period between February and April 2007. The Draft SPD was sent to the key stakeholders, DPD bodies, Council Members, residents and occupants on the site. Letters advising on the availability of the SPD and about the consultation were also sent to residents in the area around the site. The Draft SPD and accompanying documents, along with the questionnaire, were deposited at the Town Hall and in the Crawley Libraries for inspection and were made available on the Council's website. A three-day public exhibition was held in March 2007 in County Mall, and two evening drop-in sessions for stakeholders and residents were held at the Town Hall. The exhibition was also displayed in the Town Hall Foyer for a week. An article describing the proposals and the consultation was published in the Crawley Live Magazine which is distributed to all households in the Borough, and Press Notices were displayed in three local newspapers, Crawley Observer,

Crawley News and the West Sussex County Times during the week the consultation commenced in accordance with Regulation 17(c).

- 3.3 The exhibition at County Mall attracted considerable attention with well over 1,000 visitors and 500 questionnaires handed out. However, only 30 completed questionnaires were returned. 29 letters or e-mails were received, of which 5 were from individual residents, 1 from Northgate Road. Organisations responding included neighbouring local authorities, utility companies, landowners and occupiers within the site, public transport operators, the Highways Agency, Natural England, the Cycle Touring Club, Sussex Enterprise, Central Sussex College, the Magistrates Courts Service, the Theatres Trust and Grosvenor.
- 3.4 Representations received during the consultation raised questions about the appropriate site area for TCN, about the scale of the development and the impact on neighbouring town centres. These issues were debated during the Examination into the Core Strategy which allocated the TCN site, and the SPD was not, therefore, progressed until after the Inspector's report into the Core Strategy was published at the end of August 2007. The Inspector found the approach to TCN to be sound and strengthened the policy with reference to the scale of the retail, number of housing units and quality of offices anticipated. The Inspector did not believe there would be any adverse impact on neighbouring town centres, and believed the entire site was necessary and should be developed comprehensively with one lead developer. Changes were made to the SPD to reflect these Inspector's recommendations on the Core Strategy.
- 3.5 The TCN Members' Working Group discussed the responses received to the consultation and the proposed changes to the SPD at a meeting on October 22, 2007. The SPD was reported to the Borough Council's Executive on November 21 2007 with a table summarising all the individual responses received and the consequent changes to the SPD. The Executive supported the changes and recommended the adoption of the SPD. A formal Statement of Adoption was published in January 2008.

4. Consultation on the Revised Supplementary Planning Document

- 4.1 The public consultation on the Revised SPD involved letters explaining the changes being sent to all statutory consultees, key town centre stakeholders and landowners within the site, (including Northgate Road residents) from 8 October – 7 November 2008 . The revised documents were also posted on the Borough Council's web-site, and were available at the local libraries. A press notice and press release were also issued and four local newspapers ran a story as well as the national magazine "Regeneration and Renewal". The Portfolio Holder for Planning and Economic Development was interviewed by two local radio stations, and a story appeared on the BBC South East lunchtime news and the BBC News Website.
- 5.2 Eighteen representations were received during the consultation period and these are all summarised in Appendix 1, together with the Council's response.

- 5.3 As a result of the representations, an additional “residential” annotation was added to the Masterplan in the SPD, but it was considered no other changes to the document were appropriate.

Draft Revised Town Centre North SPD October 2008

Representations

Organisation	Contact Name	Summary of Representation	CBC Response
Surrey County Council	Mr R. Evans Principal Planning Officer	No specific concerns regarding the minor revisions now subject to consultation. However, Surrey again emphasises the concern at the possible impact of growth, particularly retail growth, at Crawley town centre, on Surrey town centres. This concern is also being raised in regard to the Secretary of State's Proposed Modifications to the South East Plan which support growth at Crawley.	Noted. The Inspector examined Policy TC1 and the conclusions of the report which considered the potential for serious adverse impacts. The SoS Modifications support the growth of Crawley as a Significant Change.
Tandridge District Council	Mr R. Evans, Director of Planning	Tandridge wish to be consulted early on the Transport Assessment and Travel Plans. Reiterate concern raised previously about impact of retail growth at Crawley on Caterham and Oxted town centres. Support enhancement of the Town Centre's role as a major public transport interchange.	Noted. The Inspector examined Policy TC1 and the conclusions of the report which considered the potential for serious adverse impacts. The SoS Modifications support the growth of Crawley as a Significant Change.
Steve Brown	WSCC	No comments	Noted
Southern Water	David Sims Planning Policy Corporate Policy	Support previous changes and have no further comments to make with regard to this consultation. Southern Water welcome continued involvement in the Local Development Framework programme.	Support noted.
Thames Water Property Services	Georgie Cook	Pleased that the draft SPD includes a utilities infrastructure section but reiterate previous concern that it does not provide sufficient guidance on sewerage infrastructure requirements. Concerned Waste Water Service, particularly the sewerage network capacity, is unlikely to be able to support the demand anticipated from this development. Thames will need to undertake an impact assessment of the development and potentially upgrade their assets which could take up to three years lead in time. If no improvements are programmed by the water company, the Council must require the developer to fund appropriate improvements that must be completed prior to occupation of the development as the water and sewerage undertakers have limited powers to prevent connection ahead of infrastructure upgrades. Phasing or Grampian style conditions should be used to ensure capacity problems, possibly leading to flooding, do not occur. <ul style="list-style-type: none"> Detailed additional wording is proposed regarding waste water capacity, and also surface water drainage. Supports tree planting but not over the route of the sewers.	The SPD requires conditions for all companies and specifies drainage and sewerage requirements. Thames Water informed of the lead time for capacity improvements confirmed at the Council's meeting. The Council will require sufficient capacity for the development. Thames Treatment Works to be upgraded. The Local Development Framework Strategy requirements for the development are a programme of work to be completed. Thames Water Asset Management requirements of the development must continue to exist. The Council will require the SE Plan requirements for the development between the Borough and the Council regarding this capacity.

Organisation	Contact Name	Summary of Representation	CBC Response
South East England Regional Assembly	Dominick Veasey Regional Planner	SEERA has no further comments to make.	Noted
Valsion International Limited	Kevin Revill, Revill Consultancy	Reiterates concerns raised previously, notably the objection to the SPD's requirement for a comprehensive redevelopment with a single lead developer which has not been justified. Does not consider the interests of a number of "stakeholders" have not been considered and recognised. Believes site could be split into separate parcels for redevelopment, coordinated within an overall masterplan. This finer grain approach, reflecting existing property ownership boundaries, would provide flexibility for changing circumstances and take better account of stakeholder interests, including relocation requirements. Also, concerned with delay in progressing and consulting on more detailed proposals.	The Inspector examined Policy TC1 and the entire site was noted for the high quality of the scheme shown that the scheme should be comprehensively managed directed in a unified lead developer into SPD was amended Grosvenor is planning 2009 and is encouraged of progress.
Sainsbury's Supermarkets Ltd	D. Carroll White Young Green	Strongly support the revised SPD, particularly the identification of the Sussex House site for mixed use development. Believe a foodstore should be the primary use on this site and agree it will form an anchor, a focal point and attract pedestrians.	Support noted.
Her Majesty's Court Service (HMCS)	Stephen Harrington DDP	It is critical that the existing Magistrates' Court is capable of operating effectively and is not compromised by the redevelopment of neighbouring development sites. HCMS is now satisfied that the Indicative Masterplan has been sufficiently amended to address the concerns raised previously regarding vehicular access to the Courts and retention of the cells. However, the Masterplan should indicate the proposed uses of the blocks to the north and south of the Court building as HMCS would not be in favour of any neighbouring uses in close proximity to court that may impact detrimentally on its safe and secure operation. Welcome para 19.14 that outlines the need for future neighbouring development to ensure that it does not compromise the operational requirements of the Magistrates' Court. However, there should be stronger reference to the importance of Magistrates' Court and more emphasis on the sensitive needs of the court facilities and their users, on the safe and secure functioning of the Courts both during the construction phase and longer term, the need for sympathetic design, prevention of overlooking and ensuring access is not disrupted. Part 7 lists a number of community facilities which may be required to cater for the additional demand created by the development, and this should include the need to fund the improvement and / or replacement of court facilities through S106	Agree. Residential Indicative Masterplan Consider the reference operational requirements this. HCMS will be this area is progress arrangements are not It is not considered needed to serve the specifically. Inform following their reps no justification for the

Organisation	Contact Name	Summary of Representation	CBC Response
		Agreements.	received.
NE Sector Consortium	S. Brown Woolf Bond Planning	<p>Consortium has an interest in the development of the NE Sector for a neighbourhood of 2,700 homes, as identified in the W. Sussex Structure Plan and the adopted Crawley Core Strategy.</p> <p>No objection to the principle of the proposed redevelopment of the town centre but concerned about the Council's reliance on this redevelopment to help deliver a material amount of residential units in the short to medium term. Consider there is considerable uncertainty as to the timing and phasing of any development and that the revisions to the SPD fail to clarify matters in relation to the anticipated date of any housing delivery from this site.</p> <p>The development is complex, with many existing land uses and multiple land ownerships. Land required for the relocation of numerous significant buildings and new buildings will need to be occupied before other parts of the redevelopment could occur. Objections to relocation make it likely that CPO powers will be required, raising compensation issues and reversion to the Lands Tribunal.</p> <p>The revisions to the SPD should include details as to how the CPO process is to be managed, including phasing arrangements.</p> <p>TCN will accommodate predominantly flatted development which raises an issue as to the marketability and demand for flats in the Town Centre. SPD revisions also fail to adequately deal with the need to ensure an appropriate level of "on-site" affordable housing provision.</p> <p>SPD revisions fail to clarify the number of parking spaces to be provided. Based on parking standards for residential and retail uses, the scheme results in a need for at least 3,400 car parking spaces.</p>	<p>The complexity of the SPD therefore revisions reflect on development partner includes the resolution between the Council anticipated to be signed anticipated a detailed and implementation with the developer is signed.</p> <p>The revisions result viability of the scheme within the development (Town Hall) and the Town Centre. The of the scheme. The buildings is taken in TCN and was recognised Inspector.</p> <p>The SPD requires t direction and clear evidence of negotiation site. It does, however may be required.</p> <p>The SPD requires 4 recognises that acc result in too many s therefore provides f The SPD requires t Access Demand th strategy. The SPD should take into acc as a whole and sho provision. This res standard being app residential parking standard.</p>
The Highways Agency	Mrs Margaret Pratt Network Operations Division South East	<p>The Highways Agency is responsible for managing and operating a safe and efficient strategic road network, ie. Trunk Roads and Motorways.</p> <p>Para 6.1-HA highlights the need to ensure that any required infrastructure is appropriately phased in line with development.</p> <p>Para 9.2 - Welcome reference to Transport Strategy. Could consider more detail to demonstrate how the sustainable transport modes will be given priority.</p> <p>Para 16.7- HA ask to be involved if any proposal for park and ride is developed further.</p> <p>Para 20.1- A Transport Assessment and Travel Plan will be required, using GTA and 02/2007.</p>	The Highways Agency of the development It is considered sufficient importance of susta
Environment Agency	Miss K. Gosling Plg Liaison	No further comments.	Support noted.
The Theatres	Rose	The Theatres Trust is concerned with the protection	Noted

Organisation	Contact Name	Summary of Representation	CBC Response
Trust	Freeman	and promotion of theatres. They assume, unfortunately, that the SPD requirement for TCN to “integrate fully..... other parts of the Town Centre” does not include Crawley’s excellent Hawth Theatre as being part of the thriving town centre.	
St Joan Close Langley Green	P. Hall	Approves of the plans for the town centre. Concerned about the loss of Sainsburys from the town centre	Support noted. Re Sainsburys by rec an anchor function
24 Kilnmead Northgate	W. Young	Concern re. potential increased traffic in Kilnmead due to new Town Hall location.	Town Hall parking v parks.
	B. Iles	Concerned re loss of Sainsburys store from the town centre. Questions need and cost of new Town Hall, and proposed university.	Revised SPD allow recognising a food function for land w Town Hall relocation scheme to take pla developer. University proposal
Hazelwick Road, Three Bridges	J. Cooban	Objects to loss of mature tree lined Boulevard, a fundamental townscape feature of the New Town.	Trees will be lost to development. How developer to design submit a landscape provision of trees is
Filbert Crescent Gossops Green	Mr Blood	Raises several concerns:- Town Hall moved away from the centre; Substantial removal of buildings on the southern side of The Boulevard; Too many central car parks; Limited pedestrianisation; 4 urban blocks at the centre with shops on the periphery; Homes should all be flats, and rentable; Concern regarding capacity to support new shops, particularly John Lewis; Should consider a park and ride scheme, perhaps at County Oak; The Council should not take out loans to fund the scheme.	The revised SPD p location for the Tow new civic square. (the High Street). It up prime retail front new location. There is no change the southern side o at upper floor levels the west and east, a Boulevard will be p ground floor level in Boulevard, with flats All the retail studies Grosvenor demons The SPD requires a demonstrate how th development will be The development is