

# Appendix 3

## Verbatim Representations

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## Category 1: General Feedback

Name	Organisation	On Behalf of:	General Feedback Comments
Tricia Butcher	The British Horse Society		<p>The overall commitment shown in this document towards protecting and enhancing the green infrastructure, public rights of way and recreational routes in the Borough is to be welcomed. This is in line with the new National Planning Policy Framework, para 75, which states "Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks."</p> <p>By acknowledging the importance of these assets to the communities quality of life, the economy, and to wildlife, it is to be hoped that the potential threat from increasing levels of development will be mitigated.</p>
Katherine Harrison	Surrey County Council		<p>Cross Boundary Working</p> <p>We would like to see a clearer policy commitment in the Local Plan Preferred Strategy to cross boundary working. The consultation draft Local Plan Preferred Strategy includes reference to the need for cross boundary working and mentions the cross boundary impacts of development. However, there is no specific policy hook for cross boundary mitigation to be funded by the developer. Evidence should be provided in the Local Plan to establish whether Crawley Borough Council has considered the possible cross boundary impacts of the development proposed in the Local Plan on Surrey as a neighbouring authority. If significant impacts are likely to arise, then they will need to be mitigated. In transport infrastructure terms, this is specifically required to ensure the continued safe and efficient operation of the strategic and local road networks.</p>
Gary Marsh	Mid Sussex District Council		<p>Mid Sussex District Council welcomes the opportunity to comment on Crawley Borough Council Local Plan Preferred Strategy.</p> <p>Having considered the Preferred Strategy, Mid Sussex District Council looks forward to continuing to work with jointly with Crawley Borough Council on cross boundary issues before the next version of the Local Plan is finalised.</p> <p>I would be grateful if you could contact my Head of Planning and Economic Development, Claire Tester, in due course to arrange a further meeting to discuss such matters.</p>
Collin Lloyd			<p>Thank you. I trust the document contains policies which are sufficiently robust to protect small areas of green space in residential areas from development. As an example of what I mean I cite the most unfortunate decision of the council's cabinet to make available for consideration for development the green at Ely Close in Tilgate and to explore the feasibility of development on other similar greens, such as at Chichester Close. Typically these are obscure and micro locally highly valued places which have lain undeveloped since the advent of the New Town in the early 1950s and which play their part in contributing to the green character of Crawley. I hope the councillors who have been working on the new document have been alive to the possibility that the green character of Crawley could be vulnerable to progressive erosion unless the planning policies are in place to enable confident resistance by this and future generation of planners and councillors.</p>
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	<p>The Local Plan is clearly defective as it provides insufficient land for housing. There is also a real risk that policies of the plan will impose unreasonable burdens on the housing land that is available which may also frustrate the delivery of those sites which would worsen the situation further, contrary to national guidance.</p>

Name	Organisation	On Behalf of:	General Feedback Comments
			Both of these issues need to be resolved before the Council can proceed to a Submission Draft Local Plan.
Peter Jordan			<p>I found the Plan exceptionally difficult to read for a number of reasons:</p> <ol style="list-style-type: none"> <li>1. The use of many words where fewer would have been better.</li> <li>2. The use of jargon where plain English would have been clearer.</li> <li>3. The lack of an overall means of navigation.</li> <li>4. The lack of any distinction between policies which CBC might implement directly, those where CBC might provide enabling infrastructure, and those where CBC might provide encouragement, for example by providing funding to others.</li> </ol> <p>To illustrate point 1, let us take a section from page 20:          “As a new town with a large stock of modern and generally well maintained housing, precedence for maintaining this standard has been set. All new housing and its surroundings should be suitable in terms of size, design and facilities for the requirements of its occupants and should not give rise to environmental and amenity problems.”</p> <p>These 55 words are “Motherhood and Apple Pie”, in other words support for a principle that nobody would disagree with, which says nothing that moves the discussion on to any sort of conclusion.</p> <p>An example of point 2 is “cultural offer”. This leaves me baffled; who is offering what to whom? The only justification for jargon is that when used between specialists it should convey precise meaning. It should not be used in communication with non-specialists. I suspect that this particular bit of jargon fails to convey precise meaning even to specialists.</p> <p>On point 3, there appears to be a hierarchical relationship between vision, strategic policies, other policies etc., but the reader is left to follow multiple references in the document to discover the relationship between these. A simple tree diagram would give an overview of these relationships and aid navigation through a complex document. Draw a map of which sections of the vision are addressed by which strategic policies, and how these are implemented by lower-level policies.</p> <p>On point 4, and returning to “cultural offer” for an example, it would be helpful to clarify who the CBC thinks would provide cultural input, what those cultural inputs might be, and what CNC thinks it could do to provide, enable or encourage those inputs. I can imagine that provision of The Hawth might be one of the ways of providing “cultural offer” but beyond that, imagination fails. The draft needs to be more specific.</p> <p>In future, to aid a meaningful consultation, it would be worthwhile to invest effort to make the draft much smaller. At an estimate, it could be shrunk by 50% without much difficulty by removing unnecessary statements and making those that remain more concise.</p> <p>In my opinion, the draft is not an adequate starting point for consultation because it is extremely difficult to extract any meaning from the dense thicket of words. Why not consult the Campaign for Plain English who would be delighted to advise you?</p>
Valerijus Vilcinskis	Eastern Stream Association		I am chairman of Eastern Stream Association in Crawley. I would like to have included in the forward planning documents that we wish to open an Eastern European Culture Centre.

Name	Organisation	On Behalf of:	General Feedback Comments
Sally Stallan	Horsham District Council		We look forward to being involved in subsequent stages of the Development Framework process and welcome the opportunity to work alongside Crawley Borough Council to seek acceptable outcomes on any identified cross boundary issues.
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd	<p>SEE FULL REP - Failure to Demonstrate the Duty to Cooperate</p> <p>Crawley Borough Council has not demonstrated the Duty to Cooperate with its neighbours, Horsham and Mid Sussex. There needs to be a clear statement of the steps taken to demonstrate this duty and the plan needs to reflect the specific housing allocations outside the Crawley boundary which are to meet Crawley's housing needs that cannot be met within its boundary. The Crawley Local Plan should specifically make reference to the New Market Town as a medium to long term housing solution.</p> <p>The Duty to Cooperate is a legal requirement and is significantly more than a responsibility to discuss relevant matters with adjoining local planning authorities. Whilst forums in which to discuss matters are clearly in place, no meaningful information is set out in the Preferred Executive Summary 20582/A5/RS/DB/jp/djg 03 December 2012 Strategy Consultation Draft Local Plan as to how the significant housing needs of Crawley that cannot be met within its boundaries are to be provided. This is vital in Crawley's case as there is a clear inability for it to meet its full housing needs within its boundaries.</p> <p>Given the above, a way forward that would positively respond to the Duty to Co operate requirement, would be for the three local planning authorities (Crawley Borough Council, Mid Sussex District Council and Horsham District Council) to jointly commission work to identify objectively assessed sub regional housing needs and test the options for meeting those needs. It is considered that a New Market Town, between Sayers Common and Henfield on the A23, is integral in meeting sub regional housing needs.</p>
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd	<p>SEE FULL REP - Failure to Demonstrate Soundness of the Plan</p> <p>These representations consider that the Preferred Strategy Consultation Draft Local Plan is unsound. The Preferred Strategy Consultation Draft Local Plan is not based on a strategy that seeks to meet objectively assessed housing need and is not considered to meet any of the four tests of soundness set out in paragraph 182 of the NPPF.</p> <p>The Preferred Strategy Consultation Draft Local Plan fails the 'Positively prepared' soundness test as it does not meet Crawley's objectively assessed housing need. It fails the 'Justified' soundness test as the Local Plan evidence base does not consider how Crawley's full housing needs can be met. It fails the 'Effective' soundness test as it is not based on effective joint working on cross boundary strategic priorities, specifically housing. It fails the 'Consistent with national policy' soundness test as it does not meet the other soundness tests, meet the Duty to Cooperate requirement or meet Crawley's objectively assessed housing need.</p> <p>A New Market Town would require positive, close and ongoing working between Crawley Borough Council, Horsham District Council and Mid Sussex District Council following on from the initial joint commissioning of the GL Hearn New Market Town Study. Effective joint working would</p>

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			<p>positively respond to the Duty to Cooperate introduced by the Localism Act. Mayfield Market Towns Ltd will continue to promote the concept of a New Market Town through all future stages of the Crawley, Mid Sussex and Horsham Local Plans and ultimately at the Examination-in-Public of all three Local Plans.</p>
<p>Mark Bewsey</p>	<p>Savills</p>	<p>Homes and Communities Agency</p>	<p>SEE FULL REP (THIS IS CONCLUSION)</p> <p>The HCA, as a significant landowner within Crawley borough, welcomes CBC's vision of Crawley as the premier town between London and the South Coast, and for the sustainable growth of the town. The HCA does however have concerns over the scale of development proposed which does not address the identified need for housing established through the LDF evidence base.</p> <p>The emerging Local Plan should be informed by the available evidence base which includes a Locally Based Housing Needs Assessment (2011) which identifies a requirement of 300-600 new homes per year. The Council should plan to achieve the upper end of the range (500-600 new homes per year) as the lower range would only meet housing growth linked to economic growth. The Housing Needs evidence base should take precedent over delivering housing merely to support projected economic growth, in accordance with NPPF paragraph 158. An allocation below this range will fail to meet an identified need and may mean that local people in need of a house will be displaced by wealthier in-migrants.</p> <p>Draft policy H1 sets a requirement to deliver 3,543 dwellings over the plan period, equating to an annual average of 236 dwellings. This means that the Local Plan does not "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community". Overall this approach is contrary to NPPF paragraphs 7, 50, 159 and 160.</p> <p>In order to address the lack of housing supply, CBC should actively seek to identify additional available, appropriate and deliverable sites. The Land East of Tinsley Lane and the Kilnmead site are both available and entirely suitable for residential development. Accordingly policy H2 should be amended to include residential allocations for these sites.</p> <p>The HCA welcomes Crawley Borough Council's aspiration to deliver a major mixed use redevelopment in the Town Centre North area. Given the status of Crawley as a Regional Hub, the HCA urges Crawley Borough Council to promote high density development within the Town Centre North area in order to make the most efficient and effective use of land. The HCA also suggests that policy EC4 should be amended to promote residential use of under-used peripheral town centre sites in order to further improve the vitality and viability of the town centre.</p> <p>The HCA recognises that the borough is compact in nature and has limited land availability. In addition the Gatwick Safeguarding Area presents a significant constraint and this should be recognised within the Local Plan.</p> <p>Overall, in order to ensure that the Local Plan is sound, CBC should ensure that it is positively prepared, justified and in accordance with the NPPF. CBC can go some way to addressing this through allocating the Land East of Tinsley Lane and the Kilnmead site for residential development.</p>

Name	Organisation	On Behalf of:	General Feedback Comments
Elizabeth Burt	Savills	Crest Strategic Projects	CSP would be pleased to discuss any of the comments within this representation and the site being promoted and is keen to be involved in futures stages of the production of the Local Plan. CSP strongly recommends the Council re-assesses its evidence base and proposes a housing figure based on this. It also recommends that the Council undertakes discussions and joint working under the duty to co-operate required with HDC and the interested parties on the potential for the site adjacent to west of Bewbush to deliver some of CBC's housing requirements to meet the objectively assessed need for this. It is confirmed this site is available for development and would form a logical site for development.
Michael Simknins	Michael Simkins LLP	Private Landowner	<p>SEE FULL REP (THIS IS CONCLUSION...) -</p> <p>Having reviewed the Local Plan Consultation Draft, it is evident that the Borough Council needs to refine its Table 1 of the Housing Chapter and establish its objectively assessed housing needs. As per the example of Suffolk Coastal, an Inspector at Examination will require the Council to set this out and if it cannot meet that requirement explain why.</p> <p>In light of this imbalance, land that is available, suitable and deliverable for housing is at a premium within the Borough. As per this representation, there exists an opportunity to identify an additional 'Key Housing Site' within Policy H2 to aid with meeting the Council's future housing needs.</p> <p>The land benefits from the same Policy status as that now consented within the North East Sector (1,900 units) and that recently identified as a Key Site (residual land – 100 units). With such Policy support and following a grant of consent, given its scale the land could also come forward quickly to aid the Borough Council with its 5 year land supply requirements.</p> <p>We trust that this representation is duly made and helpful to the Borough Council in preparing its emerging Local Plan. We would be happy to discuss this representation with you in person and work with the Borough Council on behalf of the landowner in delivering this opportunity towards future housing delivery.</p>
S Doherty	Civil Aviation Authority		The Civil Aviation authority are no longer a necessary consultee.
Lionel Eric Crawford			SEE FULL REP... Concentric circles
Colin Maughan			<p>Thank you for sending me notice of the second stage document. It is an impressive piece of work and does indeed incorporate many of the comments made by the public during the consultation period.</p> <p>I may come back to the document itself but I have two grave reservations based on my own observations of Crawley BC's approach to managing projects.</p> <p>Firstly, I see two extreme approaches:</p> <p>a) Penny pinching in the case of purchasing trees – for replacing old and perhaps dangerous trees, poor quality young trees are bought from a nursery in Wales, which often die due to neglect or vandalism. Full size trees are often replaced by scrub sized trees, undermining the garden city concept because scrubs are easier to manage.</p> <p>b) Conspicuous waste, as in the case of the Marshall's stainless steel</p>

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			<p>outdoor seating recently installed in the town centre and the neighbourhoods. The existing wooden benches needed re-varnishing, but they were low key and reasonably comfortable. The new seats are too cold for comfort and the supporting columns are so high that nobody's feet touch the ground when they sit on them. Like almost every item in the Marshall's catalogue they are vulgar and brash, like the Fastway bus shelters. To add insult to injury, when the new benches were installed, the workmen couldn't be bothered to remove the brown tape holding the protective covering used when they were transported. Why does CBC choose hideous street furniture, and have it installed by subs?</p> <p>Similarly, when the Furnace Parade and Tilgate shopping parades were refurbished the ridiculous amounts of money wasted, and the disruption caused by the casual approach to work by the contractors, was closely observed by shopkeepers and shoppers. This neglect on the part of the council to spend public money wisely, and to monitor work it has commissioned, has done a great deal of damage to its reputation. In the case of Furnace Parade, where I do my shopping the builders damaged the roofs of the Foxglove or Jacaranda tree by the post box, and killed it off. And then there was the remedial work relaying the paving because the electricity supply to the lighting had been forgotten. I will not spend time writing all the problems, but it was a poorly managed project.</p> <p>I don't know how Crawley BC places its contracts, but its record is far from impressive. Perhaps the staff in the council responsible for contracts do not realise that very few companies do good work, and perhaps they do not realise that sometimes midnight has to be burned. It certainly isn't easy to make good design and planning decisions, but if the plans once arrived at are not faithfully carried out, it ends in tears.</p> <p>Even more worryingly, it is my impression that planners, architects, and designers, working now, have no philosophy and no vision. I have been in the last few weeks to Birmingham and Sheffield, two wonderful cities ruined by traffic engineers determined to give motorists priority over pedestrians, but equally unfortunately the replacement buildings are all disgraceful examples of the work of developers' architecture. Are these professions stating on the shoulders of giants? Colin Benchamn the "Traffic in Towns" guru, maybe, but certainly not Lewis Mumford the planner, or Walter Segal the housing architect. The body of knowledge stretching back to the Greeks and Romans seems to have been ignored or lost. Allowing the tail (in your case Marshall's) to wag the dog is ruining this town and, if you are not careful, the last chance of turning the tide with the new Local Plan will be missed. It is ironic that the first stage in the Town Centre North work is to demolish arguably the most outstanding piece of architecture in the High Street, the Embassy Cinema.</p> <p>As you said when we met, I am trying to educate you. But are you taking what I say on board, and if so will CBC take what you say on board?</p> <p>Judging by appearances, the present regime is like the country's major parties, believing that bigger is better, private is always better than public, and free markets are the future. My generation often found that there were no good products, including street furniture, available; some persuaded the manufacturers to make what we wanted. Unfortunately, this was more successful if it was made in Germany, but that is another story. I can assure you that there are some very good firms here. I</p>

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			visited two excellent modern factories last week.
Neil McDonald			OBJECTION - Third, and in the light of the above, I object to being advised that consultation on the document closes at 5.00pm Monday 3 December

## Category 2: Development Strategy

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
Tricia Butcher	The British Horse Society			Green Infrastructure (pg 22) This paragraph is strongly supported. The network of green infrastructure, including green corridors, must be protected because of the many benefits it brings.
Tricia Butcher	The British Horse Society			Corporate Plan (pg 27) - support is given to priority 6, although specific reference to informal leisure activities would have been preferred
Tricia Butcher	The British Horse Society			Page 34 - Bullet points 2, 3, and 4 are all supported as key environmental aims.
Tricia Butcher	The British Horse Society		STRAT4	Strategic Objective 3 "protect, enhance and create opportunities for Crawley's unique Green Infrastructure" is strongly supported.
Katherine Harrison	Surrey County Council		STRAT 4	<p>The Local Plan refers to a Carbon Neutral Commitment on page 27 which states that, "The Crawley Carbon and Waste Reduction Strategy aims to make Crawley carbon neutral and zero waste by 2050...". Support for carbon neutral commitment is strongly supported and recurs through the vision, objectives and policies, however, the zero waste commitment is not again mentioned. Crawley Borough Council's pledge to reducing waste in Crawley should therefore be strengthened by amending Objective 16 on page 30 to read: "Objective 16: To work towards ensuring Crawley is a carbon neutral and zero waste town by 2050." To follow this through, Policy STRAT4 and Policy ENV 1 should be revised by the addition of the words "and zero waste" immediately following the words "carbon neutral" in line 2 of Policy STRAT4 on page 34 and in line 2/3 of Policy ENV 1 on page 96. For completeness and to improve consistency, the words "and zero waste" should also be inserted after the other references to "carbon neutral" throughout the Local Plan.</p> <p>These amendments would helpfully provide further impetus to minimise waste arisings and reduce residual waste exports to surrounding areas which have the potential to increase in the medium term. This is important as the draft West Sussex Waste Local Plan (June 2012) accepts that existing landfill capacity within West Sussex will run down over the first part of the plan period and no provision is made for future landfill sites through criteria based policies or allocations other than a small extension to an existing landfill.</p>
Katherine Harrison	Surrey County Council			The promotion of a high standard of sustainable construction, through Objective 17 on page 30, and through the promotion of the Code for Sustainable Homes and BREEAM in Policy ENV 1 on page 96, is supported as this will ensure compliance with the Site Waste Management Plan Regulations 2008 through supporting the re-use and recycling of construction, demolition and excavation waste (CDEW) and the diversion of CDEW from landfill in the

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				locality and surrounding areas. This will also help deliver sustainable development by driving waste management up the waste hierarchy in accordance with PPS10.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	STRAT3	<p>The National Planning Policy framework (NPPF) requires local authorities to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area' ( NPPF paragraph 47).</p> <p>The Spatial Development Strategy set out on page 15 of the Crawley 2029 Preferred Strategy recognises this as 8,100 dwellings from 2014-2029 from Scenario A in the evidence base. This document also set out ranges from under 5,250 dwellings to 9,450 dwellings over the same period. This latter figure is likely to meet the current local projection of housing need and demand but is also likely to lead to pressure for inward migration and a mismatch between the provision of new homes and jobs. Whilst a rate of 400 dwellings per annum has been achieved over the past 20 years (equivalent to 6,000 over the plan period), the evidence base shows that 550 dwellings per annum (equivalent to 8,250 over the plan period) is likely to support most demographic needs including migration and is therefore the most sustainable. Policy STRAT3, which aims '...to positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible...' is therefore welcomed.</p>
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		As set out in Section 2 above, it is considered that provision of 8,100 dwellings from 2014-2029 is the most sustainable and appropriate level of growth in order for the Preferred Strategy to be found sound.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		The identified deficit in housing supply needs to be addressed in line with the strategy of locating development in sustainable locations that are not physically constrained. In seeking to meet this deficit it is clear that land south of Antlands Lane can assist in meeting the shortfall in a sustainable manner, in accordance with the spatial strategy.
James Stevens	Home Builders Federation Ltd		STRAT3	We note that scale of the housing need that is likely to materialise over the proposed plan period up to 2029. The NLP report that the Council has commissioned indicates that an additional 8,100 new homes would be needed to accommodate the future housing needs of the Borough (based on the baseline demographic natural change), and the Council has referred to this on page 15 of the preferred option of the Local Plan. The draft Local Plan is proposing to provide 3,543 net additions over the 15 year plan period running from 2014-2029. This equates to an annual average of 236 net additions per annum.

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				<p>We acknowledge the constraints that confront Crawley and the impracticality of the Council addressing wholly its entire housing needs within its own administrative boundaries. It was for these reasons that the South East Plan (SEP) set out in policy GAT3: Housing Distribution how meeting the Borough's housing needs would take the form of housing developments at or adjoining Crawley, thereby complementing its role as a transport hub and regional centre. As the SEP indicated, this would most likely involve (indeed, the only feasible solution) the westward expansion of Crawley into the neighbouring authority of Mid Sussex, complemented by the North East expansion of Crawley itself within its own administrative boundary.</p> <p>Clearly then, in order to meet the housing requirement of the SEP, this requires Crawley to cooperate and reach an agreement with Mid Sussex Council. If this cooperation is not forthcoming, then Crawley's housing requirement will have to be a capacity constrained target. The Borough will be unable to meet the objectively assessed level of need of 8,100 homes. The Borough acknowledges itself on page 80 of the draft Local Plan.</p> <p>This is the central issue that the emerging Local Plan will have to address.</p>
Chris Owen	West Sussex County Council			<p>Spatial Development Strategy – Sustainability and Green Infrastructure:</p> <p>Reference to 'Sites of Nature Conservation Interest' in paragraph (i) should be amended to read 'Sites of Nature Conservation Importance'.</p>
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	STRAT3	<p>SUPPORT - It is noted that the Borough Council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible. In this respect the site at Oaksworth, Worth, remains available and should be considered as suitable for housing development. This is likely to require an amendment to the Built Up Area Boundary and/or an amendment to Policy CH12.</p>
Cath Rose	Reigate & Banstead Borough Council		STRAT3	<p>We support the recognition of the benefits of on-going cross boundary working and the commitment from CBC to positively consider proposals for the provision of housing to meet local needs and needs across the wider HMA. Reigate and Banstead falls within the local East Surrey Housing Market Area, also relating to, and functioning as part of, the wider Greater London HMA. There are also some more localised movements between the southern part of the borough (Horley) and Crawley, although we do not consider these to be strategic in nature. We welcome the work that is being carried out by those authorities in the North West Sussex HMA (Crawley, Mid Sussex and Horsham) to explore future housing provision across the</p>

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				North Sussex Housing Market area, and would like to reiterate our willingness to be part of that work insofar as it relates to localised cross boundary movements between Crawley and Reigate & Banstead (Horley). We would suggest that this work should be completed before the Crawley 2029 Plan is finalised for submission.
Jack Straw	Mole Valley District Council		STRAT3	<p>8. We acknowledge policy STRAT3: Meeting Housing needs across the Housing Market Area, but although the preceding text talks about cross-boundary working to understand the nature of the wider housing market area, this is not reflected in the policy which appears to relate only to development within the Borough's boundaries.</p> <p>9. It is recognised that Crawley is in a constrained position and the need to prevent town cramming and the loss of open space within the Borough is supported. However, Mole Valley is also in a highly constrained position with significant areas of AONB, Green Belt, Special Areas of Conservation and limited land supply. The concern is that if the needs of Crawley are not being met within or near to the town, this will have a knock-on effect particularly to Boroughs such as Reigate &amp; Banstead with which Mole Valley has far greater levels of movement both in terms of flows of household and travel to work patterns.</p>
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	STRAT3	SUPPORT - It is noted that the Borough Council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible. In this respect the site at Saxon Road remains available and should be considered as a housing site. This is likely to require an amendment to the Built Up Area Boundary and/or an amendment to Policy CH12.
Jane Noble	West Sussex Local Access Forum		STRAT4	Members support the continued use of the neighbourhood principle of development, where local facilities are easily accessed along informal green spaces. The Plan recognises that with this type of development local trips are most accessible by foot, cycle or public transport.
Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	...a new strategic employment site is needed in order to realise the potential of the Gatwick Diamond area to deliver a business location and opportunity of international standing that would attract major inward investment and meet the wider objectives of up-skilling the workforce and re-positioning the sub-regional economy.
Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	...Whilst we recognise the important role of these existing employment areas, reliance on these alone will not deliver the wider sub-regional aspirations for economic growth. There is a clear need for a strategic employment allocation in recognition of Crawley-Gatwick's strategic economic hub

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				<p>role.</p> <p>To achieve additionality and up-skilling and to ensure that Crawley-Gatwick remain competitive into the future will require the right kind and quality of locational opportunity to be provided. This means strategic employment site with primacy of location at the regional gateway, adjacent to the transport hub and rail station in order to attract inward investment, provide scope for innovation and to enable the knowledge led economy to prosper at Crawley-Gatwick, in competition with other areas in the South East, with other regions in Europe and other regions in the world. If Crawley-Gatwick does not take the initiative in this regard, it will be left behind.</p> <p>A strategic employment and innovation campus at Gatwick Green is proposed as a coherent response to meeting regional, sub-regional and local level employment needs. Reference is made to the accompanying Gatwick Green evidence base documents which have submitted in previous representations and which together with the Council's commissioned Employment Land Review provide a compelling argument for the allocation of a strategically located site adjoining Gatwick Airport for use as a dynamic employment, innovation, education and community campus.</p> <p>Gatwick Green can achieve and deliver this in a manner which adds to the overall economic strength of the area whilst not prejudicing Manor Royal, Town Centre North or other employment components. Gatwick Green is complementary to these other sites, not competing with them, and should be recognised as an integral part of the strategy for economic growth. Previously submitted evidence demonstrates this complementarity....</p>
Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	<p>...SEE REP... Given these consideration, housing delivery should not hold back strategic employment provision. The identification of a new strategic campus style business park as part of the employment offering for Crawley should be planned for as part of a balanced approach to delivering housing and jobs</p>
Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	<p>26. This section of the plan notes that the identification of the Crawley/Gatwick area as a centre for significant change, with associated commercial and residential growth, may present a challenge to the area with regard to rapid growth and change to both the size and form of the town as well as how people use the area.</p> <p>27. It is important for the plan to recognise the economic and social dimensions of sustainable development, and express the local planning authority's commitment to supporting the delivery of development that complies with carbon reduction, renewable energy, sustainable construction and biodiversity targets. Opportunities for exemplar projects such as the proposals for Gatwick Green should be encouraged.</p>

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Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	The recognition of Crawley's excellent transport links and the commitment to planning new development to maximise links in this network and opportunities for sustainable transport in this section of the plan is supported. In this respect Gatwick Green offers an unrivalled opportunity to meet strategic policy objectives by harnessing the potential of Gatwick Airport as a regional economic hub combined with its proximity to Gatwick railway station and transport interchange.
Tim Hoskinson	Savills	Wilky Group	Policy Context	NPPF - As set out in our comments on the approach to economic growth and employment, there is a need for strategic employment development to meet wider sub-regional needs as identified in the Gatwick Diamond Futures Plan and in the Gatwick Diamond Local Strategic Statement and supported by the Local Economic Partnership (Coast to Capital). The evidence base submitted in support of the Gatwick Green proposals demonstrates the sustainability credentials of the location and the proposed development. Under the NPPF, the emerging Local Plan has an obligation to address this opportunity positively and unlock barriers to investment.
Tim Hoskinson	Savills	Wilky Group	Policy Context	The measures set out this section of the plan for addressing the Duty to Co-operate are supported, in particular the Gatwick Diamond initiative as a means of addressing cross boundary and strategic planning issues. The evidence base previously submitted in support of the Gatwick Green proposals includes a review of the regional policy context and concludes that Gatwick Green would achieve a high degree of consistency with regional and sub-regional policy by providing for strategic development at sustainable locations to cater for the wider sub-regional needs of the area as identified in the Gatwick Diamond Futures Plan and in the Gatwick Diamond Local Strategic Statement and supported by the Local Economic Partnership (Coast to Capital).
Tim Hoskinson	Savills	Wilky Group	Policy Context	SE Plan & DUTY TO COOPERATE - The plan identifies a number of specific issues for Crawley arising from the Gatwick Diamond Local Strategic Statement (LSS). This includes the recognition that given the strength of Crawley/Gatwick as a business location and the concentration of demand there, it will be the main focus for future economic development. In relation to business development opportunities, the plan identifies the potential for opportunities within built up areas and extensions to existing employment areas. It also notes that there is potential to regenerate existing employment areas to create business environments attractive to a range of knowledge based companies, although stronger demand comes from warehousing and distribution.  However, this section of the plan fundamentally fails to reflect the findings of the Gatwick LSS that the Gatwick Diamond lacks the modern, flagship science or technology parks which are particularly attractive to national and international investors, and highlights the potential

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				<p>opportunity for a new strategic business location to attract business which cannot reasonably be accommodated within existing business areas. The need for the local authorities within the Gatwick Diamond to work together and to take a flexible and responsive approach to such opportunities is highlighted.</p> <p>Improving skills levels is also identified as a major issue for Crawley and the Gatwick Diamond. The plan notes the ambition to secure a university centre to act as a catalyst for change, raise aspirations and enable people to develop the skills needed in a changing economy. Education and training provision forms an important part of the proposals for Gatwick Green and its proposed land use mix makes provision for a multi-university campus to be accommodated, fostering links between business and education. To this end, the Wilky Group has entered into a protocol with Central Sussex College and the University of Brighton.</p>
Tim Hoskinson	Savills	Wilky Group	Policy Context	<p>CORPORATE PLAN -</p> <p>35. The priorities set out in Crawley's Corporate Plan include encouraging sustainable local economic growth and seeking out opportunities for drawing new elements into the local economy to broaden the contribution to and potential for Crawley's economic prosperity. The Corporate Plan states that these actions will be supported by efforts to raise the aspirations and skills of local people and nurture an enterprise culture.</p> <p>36. The evidence base submitted in support of the Gatwick Green proposals highlights the potential for Gatwick Green to shift Crawley's employment mix towards higher value added activities with new and additional employment activities in higher skilled jobs. Gatwick Green provides the opportunity for a significant scale of innovation focused development that would not otherwise be attracted to the area.</p>
Tim Hoskinson	Savills	Wilky Group	Local Plan Objectives	<p>LP OBJECTIVES - The proposals for Gatwick Green align well with the Local Plan objectives. In particular, Gatwick Green would make a significant contribution to meeting Objective 8: To improve the business offer and to maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</p>
Tim Hoskinson	Savills	Wilky Group	STRAT1	<p>The overarching principles of meeting the presumption of sustainable development as set out in Policy STRAT1: Presumption in Favour of Sustainable Development are supported. The proposals for Gatwick Green have been formulated to respond to the economic, social and environmental dimensions of sustainable development, as set out in the supporting evidence base and summarised below in our comments in relation to Policy STRAT2 and Policy EC1.</p>

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
Tim Hoskinson	Savills	Wilky Group	STRAT2	...SEE FULL REP - The draft Local Plan does not address either strategic or location specific proposals for a high quality B1 business hub and innovation park along the lines proposed at Gatwick Green, either as a concept or locationally at Gatwick Green. The failure of the draft local plan to provide for this form of development is an issue of soundness for the plan.
Tim Hoskinson	Savills	Wilky Group	STRAT3	<p>48. The approach set out in Policy STAT3 seeks to respond positively to proposals for the provision of housing, taking a pro-active approach to identifying suitable sites for housing development, working to overcome constraints where possible, and considering all reasonable opportunities. This is supported as a means of ensuring housing needs are met as far as possible, having regard to environmental constraints and the suitability of development sites.</p> <p>49. Also supported is the recognition that continued cross-boundary working is essential to understand the nature of the wider housing market area and ensure housing needs are being met in an appropriate and functional manner. This approach will ensure a balanced delivery of housing and jobs can be delivered, taking into account the identification of a new strategic campus style business park as part of the employment offering for Crawley as set out in our response to Economic Growth Policies STRAT2 and EC1.</p>
Tim Hoskinson	Savills	Wilky Group	STRAT4	1. Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change; The Wilky Group is concerned to ensure that Gatwick Green will be an exemplar sustainable development, anticipating future requirements in transport construction technologies, energy and waste management and biodiversity whilst being aligned closely with the employment, education and health needs of surrounding communities.
Tim Hoskinson	Savills	Wilky Group	STRAT4	2. Complements Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle; The Gatwick Green site is largely in agricultural use, although it does include some employment uses. The site is bounded by the airport to the west and the M23 to the north and east, and has the potential to accommodate strategic employment development in a manner that compliments Crawley's character and delivers a range landscape and ecological mitigation and enhancement measures.

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
Tim Hoskinson	Savills	Wilky Group	STRAT4	3. Protects, enhances and creates opportunities for Crawley's unique Green Infrastructure; The Gatwick Green proposals, which will embrace a landscape and ecology strategy that will aim to integrate existing trees and hedgerows and enhance the contribution they make to wildlife habitats and the wider green infrastructure of the locality. By extending existing wildlife habitats and creating new ones, a significant biodiversity enhancement will be achieved across the site. The proposed site for Gatwick Green offers opportunities not just for accommodating strategic development, but for the development itself to fund and deliver environmental improvements, new footpaths / cycleways, green areas and other infrastructure as it proceeds.
Tim Hoskinson	Savills	Wilky Group	STRAT4	4. Provides a safe and secure environment; and The Gatwick Green development will reflect contemporary design and sustainability credentials with an emphasis on high quality design of buildings, spaces, landscape and public realm.
Tim Hoskinson	Savills	Wilky Group	STRAT4	5. Does not conflict with other policies and objectives set out in this Plan. As set out in these representations and the supporting evidence base, the proposals for Gatwick Green is entirely compatible with the objectives of delivering sustainable development set out in the Plan. Proposed changes to policies EC1 and GAT2 are proposed to ensure consistency with the plan.
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd		SEE FULL REP - Mayfield Market Towns Ltd are promoting a New Market Town, between Sayers Common and Henfield on the A23, as a fundamental part of housing delivery in the Crawley/Gatwick Sub- Region. A New Market Town is not a new concept and is considered by the GL Hearn New Market Town Study that was produced in Summer 2010 and was jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council. Crawley Borough Council state, in an Explanatory Note on the findings of the GL Hearn New Market Town Study, that the conclusions from the study demonstrate that a New Market Town is feasible.
Mark Bewsey	Savills	Homes and Communities Agency	STRAT3	Support – The HCA welcomes the positive approach which CBC will take towards considering proposals for the provision of housing to meet local housing needs. The HCA also welcomes the commitment to work to overcome constraints wherever possible, in this approach accords with NPPF paragraph 187 which requires local planning authorities to 'look for solutions rather than problems'.
Elizabeth Burt	Savills	Crest Strategic Projects	STRAT3	Key diagram, page 14 and duty to co-operate, pages 23-25, 33, policy STRAT3 – CSP welcomes the identification of Kilnwood Vale on the key diagram as this clearly shows the relationship of the site with CBC. It also notes that a number of other sites within its boundary but not outside of this have been identified for the delivery of housing. Paragraph 179 of the National Planning Policy Framework

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				<p>(NPPF) states “Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas”. In addition paragraph 181 of the NPPF states that “Local Planning Authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination” and “Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development”. Such cross boundary issues include the delivery of housing. The Duty to Co-operate requirement is also contained in the Localism Act which requires Local Authorities to work together on cross boundary strategic issues. As is demonstrated later in this letter the housing target CBC has proposed is not based on objectively assessed needs for market and affordable housing in the housing market area as required by paragraph 47 of the NPPF. It is identified that the Borough is constrained in terms of available land and therefore it is key that the Council looks to assess the potential of providing housing on sites outside the Borough boundary to meet the identified need.</p> <p>CSP has noted that ‘Strategic Issues’ are identified on pages 24-25 of the consultation document as having been discussed with neighbouring authorities, but there is no detail on what these discussions were and what the outcomes were, i.e. was there commitment or an identification of an opportunity to work jointly and to deliver some development requirements outside the Borough boundary to meet identified housing need? Paragraph 47 of the NPPF requires the use of an evidence base to ensure Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area and paragraph 14 requires local planning authorities to positively seek opportunities to meet the development needs of their area.</p> <p>HDC is within the same housing market area as CBC, the North West Sussex Housing Market area, and it is therefore key that CBC engages with HDC to discuss potential cross boundary issues and opportunities for the delivery of housing within HDC’s boundary to meet some of CBC’s need. As highlighted CSP has an interest in land between west of Bewbush and Faygate which is in close proximity to the CBC administrative boundary. This site presents the opportunity for development to be delivered which could meet some of Crawley’s housing growth requirements over its plan period to 2029 (discussed in greater detail under the housing heading in this letter). We would strongly recommend that CBC and HDC engage and work together on potential strategies for the delivery of</p>

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				housing over their plan periods including the consideration for delivering housing to meet the needs of CBC outside its boundary.
Elizabeth Burt	Savills	Crest Strategic Projects	STRAT3	Gatwick Diamond, page 17 and 33, policy STRAT3 – This paragraph confirms that Crawley is situated centrally within the Gatwick Diamond strategic area and the Borough offers the focus for large businesses, travel and retail provision with good representation in the business services and manufacturing sectors. It makes clear that the Local Plan will ensure that Crawley's wider role will be supported but does identify that constraints mean the housing needs of the whole population cannot all be met within the administrative boundaries of the Borough. This adds clear weight to the need to work with HDC to discuss and identify a potential opportunities for the delivery of housing outside the Borough boundary to ensure housing need is met.
Elizabeth Burt	Savills	Crest Strategic Projects		<p>Housing need, page 19 (see also detailed comments under the Housing heading) - The Council recognises that increasing population growth will place demand on the need for housing. CSP acknowledges this and supports the Council's recognition that "In line with national guidance, sufficient housing should be provided to meet the needs (our emphasis) of existing and future households across the housing market area as well as to provide an appropriate amount to sustain the local economy" (page 20). This accords with the NPPF at paragraphs 7 and 17 which makes clear that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local plans that the country needs. It states that "Every effort should be made objectively to identify and then meet the housing, business and other development needs (our emphasis) of an area, and respond positively to wider opportunities for growth."</p> <p>Concerns are raised that whilst CBC has commissioned an evidence base which shows a number of scenarios for housing need (Table 1 of the consultation document), it has chosen a housing target (policy H1) based on potential housing supply as set out in the SHLAA. The housing figure put forward is 3,543 net dwellings between 2014 and 2029. This does not appear to be based on the objectively assessed housing needs of the Borough. In Table 1 of the consultation document, it identifies that for the 'baseline' demographic 'no change' scenario, there is a need for 542 dwellings per annum which equates to 8,130 dwellings over the plan period. This is significantly different to the housing figure proposed by the Council in policy H1. Full comments on the housing figure put forward and identified housing need is provided in the housing section later in this report.</p>
John Lister	Natural England		p.22	Natural England support the issues set out in paragraph J Green Infrastructure; within which the aims of the Council in protecting Green Infrastructure are detailed. Natural England agree with the justification text as follows; 'Green Infrastructure can improve the quality of Life of residents

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				and therefore requires protection from ill considered development'.
John Lister	Natural England		p.27	<p>Natural England offer support to the following objectives;</p> <ul style="list-style-type: none"> <li>• Objective 10: To ensure the protection and enhancement of valued open space;</li> <li>• Objective 13: To ensure the provision of sufficient infrastructure to meet the requirements of the borough;</li> <li>• Objective 15: To promote healthy, active, cohesive and socially sustainable communities;</li> <li>• Objective 16: To work towards ensuring Crawley is a carbon neutral town by 2050;</li> <li>• Objective 19: To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough;</li> <li>• Objective 20: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough, and;</li> <li>• Objective 21: To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water, sustainable design of developments and effective management of water resources.</li> </ul> <p>Natural England consider that each of these objectives carry through the aim of ensuring sustainable development runs through the decision making process. These objectives also show a clear aim to ensure the protection and enhancement of the natural environment.</p>
John Lister	Natural England		STRAT1	Natural England welcome the wording within policy STRAT1 which is taken from the Planning Inspectorate model policy.
John Lister	Natural England		STRAT4	<p>Natural England support points 1-3 of policy STRAT4 which state;</p> <p>Development will be supported where it meets the following strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change;</li> <li>2. Complements Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle;</li> <li>3. Protects, enhances and creates opportunities for Crawley's unique Green Infrastructure.</li> </ol> <p>Natural England emphasise the diverse benefits of Green Infrastructure networks; benefiting biodiversity, creating green links between areas, improving health by encouraging a more diverse range of transport modes.</p>

### Category 3: Character

Name	Organisation	On Behalf of:	Policy:	Character Comments
Tricia Butcher	The British Horse Society		CH3	Normal Requirements of All New Development a) This paragraph is strongly supported, as provides protection for public rights of way, green corridors and green infrastructure.
Chris Owen	West Sussex County Council		CH3	A requirement to maximise the use of recycled and secondary aggregates during development (sustainable construction design) should be included. This would be in line with Policy W23 of the West Sussex Waste Local Plan Proposed Submission Draft (Regulation 19), November 2012.
Chris Owen	West Sussex County Council		Local Heritage Assets:	The following introductory paragraph to this section is suggested:  Although Crawley today is characterised by its New Town status, and proximity to Gatwick Airport, it has the distinction of being one of around 40 historic Sussex towns included in the joint English Heritage, West and East Sussex County Councils Extensive Urban Survey project (EUS). Following sustained redevelopment in Crawley centre, and close to the historic High Street, in the last two decades the results of development-led archaeological excavation have provided a significant insight into the town's early industrial and domestic past.  The West Sussex Historic Environment Record (HER) should be referenced - please refer to paragraph 128 of the NPPF. Paragraph 169 similarly underlines the importance of the HER.
Chris Owen	West Sussex County Council		CH10 Part B:	English Heritage has prepared a guidance note on the soundness of local plans in respect of historic environment matters see "Heritage in local plans: how to create a sound plan under the NPPF", 25 July 2012, which is available on the English Heritage HELM website.
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	CH4	OBJECTION - The entire area of Worth Conservation Area cannot be designated as 'structural landscape' as the area contains development and not all of the area fulfils the functions of structural landscaping. The policy as written appears to be internally inconsistent by accepting development in principle but then seeking to protect and enhance the designated areas. The ambiguity would be removed by seeking development schemes which protect and enhance the character of these areas.
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	CH8	OBJECTION - The Policy is not positively framed in line with the presumption in favour of sustainable development and is therefore not consistent with national planning policy. The NPPF now expects proposals to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The term 'respects' is

Name	Organisation	On Behalf of:	Policy:	Character Comments
				<p>therefore over-restrictive and no longer appropriate to development within a Conservation Area.</p> <p>Conservation Areas rarely comprise an area of single character; rather a number of distinctive character areas are often present. It is therefore inappropriate to include the term 'cohesive character' in relation to a conservation area as a whole.</p> <p>The policy should be reworded as follows.... SEE FULL REP</p>
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	CH12	<p>OBJECTION - The policy is not positively worded to allow housing development which other parts of the evidence base consider to be acceptable in certain locations outside the built up area boundary as currently defined. Worth is an area at the urban/rural fringe that is suitable for housing development.</p> <p>The policy identifies that the prime test concerning development outside the built up area is not adversely affecting the character of the countryside. This is reiterated in the reasoned justification:</p> <p>Certain types of development may alter one or more important elements that make up a Character Area or Edge. This is acceptable if the overall character is not compromised and measures are taken to limit impacts on the character through mitigation and/or enhancement. This may be the strengthening of other elements of the area's character or general enhancement through increased biodiversity, green links and other mitigation measures.</p> <p>The countryside area around Crawley is not extensive, and in most cases, any residential development would not be remote from the town's infrastructure and services, and would be sustainably located. In the case of Worth, the countryside is defined as including existing areas of housing. For these reasons, it is inappropriate for the reasoned justification to refer to Paragraph 55 of the NPPF as the reason for omitting reference to housing in this policy as residential development in such areas would clearly not result in 'isolated homes in the countryside'. The reasoned justification and policy should be amended to make clear that where residential development would result in isolated new homes in the countryside it would not be considered appropriate.</p> <p>The policy is currently over-restrictive. The principle test is whether development would adversely affect the character of the countryside. The Policy should be reworded as Alternative 1 or 2 below.... SEE FULL REP</p>
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	CH4	<p>OBJECTION - The entire area of Worth Conservation Area cannot be designated as 'structural landscape' as the area contains development and not all of the area fulfils the functions of structural landscaping.</p> <p>The policy as written appears to be internally inconsistent by accepting development in principle but then seeking to protect and enhance the designated areas. The ambiguity would be removed by seeking development schemes which protect and enhance the character of these areas.</p>

Name	Organisation	On Behalf of:	Policy:	Character Comments
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	CH8	<p>OBJECTION - The Policy is not positively framed in line with the presumption in favour of sustainable development and is therefore not consistent with national planning policy.</p> <p>The NPPF now expects proposals to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The term 'respects' is therefore over-restrictive and no longer appropriate to development within a Conservation Area.</p> <p>Conservation Areas rarely comprise an area of single character; rather a number of distinctive character areas are often present. It is therefore inappropriate to include the term 'cohesive character' in relation to a conservation area as a whole.</p> <p>The policy should be reworded as follows:            Policy CH8: National Heritage Designations            CH8 Part A: Conservation Areas            In Conservation Areas, development will be permitted where it would preserve and enhance the character and appearance of the area.            Development will need to demonstrate consideration has been given to all of the following criteria:            i) Respond to the identifiable and distinctive character of the area            ii) – v) as existing</p>
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	CH12	<p>OBJECTION - The policy is not positively worded to allow housing development which other parts of the evidence base consider to be acceptable in certain locations outside the built up area boundary as currently defined. Worth is an area at the urban/rural fringe that is suitable for housing development.</p> <p>The policy identifies that the prime test concerning development outside the built up area is not adversely affecting the character of the countryside. This is reiterated in the reasoned justification:</p> <p>Certain types of development may alter one or more important elements that make up a Character Area or Edge. This is acceptable if the overall character is not compromised and measures are taken to limit impacts on the character through mitigation and/or enhancement. This may be the strengthening of other elements of the area's character or general enhancement through increased biodiversity, green links and other mitigation measures.</p> <p>The countryside area around Crawley is not extensive, and in most cases, any residential development would not be remote from the town's infrastructure and services, and would be sustainably located. In the case of Worth, the countryside is defined as including existing areas of housing. For these reasons, it is inappropriate for the reasoned justification to refer to Paragraph 55 of the NPPF as the reason for omitting reference to housing in this policy as residential development in such areas would clearly not result in 'isolated homes in the countryside'. The reasoned justification and policy should be amended to make clear that where residential development would result</p>

Name	Organisation	On Behalf of:	Policy:	Character Comments
				in isolated new homes in the countryside it would not be considered appropriate.
Brenda Burgess				Conservation. Attempt to keep Three Bridges Station - or at least the front facade - as this is an historical to Three Bridges as it represents the original 19th Century New town of the railway era. Also conserve Montefiore hall and Sensitive building with in the neighbourhoods
Brenda Burgess				keep and conserve the Town hall as an historic building of Crawley and a representation of 60's architecture. Same for College tower. (This does not mean that we should not renovate the offices at some point)
Jenny Frost	Ifield Village Conservation Area Advisory Committee			<p>General IVCAAC: pleased to see that:</p> <ul style="list-style-type: none"> <li>• Ifield Station improvements are to be considered</li> <li>• Ifield Meadows (south and those in the conservation area) are given high profile</li> <li>• The Village Green is mentioned</li> <li>• No building outside the built up area boundary is to be permitted.</li> </ul> <p>Locally listed buildings There is no mention of the locally listed buildings in the area (as opposed to the nationally listed buildings, which are mentioned). Was there a reason for this?</p> <p>Extension of the conservation area IVCAAC supports the extension of the conservation area and sent a separate, detailed document about this on 29 November 2012.</p> <p>Area of Special Character IVCAAC supports the designation of the 'Arts and Crafts' houses in Rusper Road as creating an Area of Special Character. We think that Horsham should be alerted to this as some of the buildings continue into the Horsham section of Rusper Rd. (although there is one where the features have been covered with white plaster and blue shutters).</p> <p>Loss of protection? IVCAAC is sorry that the four large houses and gardens in Rusper Road north east of the Arts and Crafts style houses, which were previously in the area of Special Environmental Quality (a designation that is to be removed) may not be well protected. Do other policies give these houses protection from being knocked down and replaced by higher density housing that would be out of place in the road?</p>
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH6	SEE FULL REP - "...if such standards..." (space standards) "...are slavishly applied and result in less efficient housing layouts, then additional land will be required for housing further worsening the already desperate housing supply position in Crawley."

Name	Organisation	On Behalf of:	Policy:	Character Comments
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH3	<p>SEE FULL REP -</p> <p>In addition to the identified standards referred to above (comment no 123), it is noted that Policy CH3 seeks to impose a general policy requirement for development to "adhere" to supplementary planning guidance that the Council may produce in the future. PH &amp; TW would object to this.</p> <p>This would enable the Council to create standards and impose additional burdens outside of the normal scrutiny of the development plan process and then impose them as though they were policy through CH3. This is contrary to national guidance contained in the NPPF at paragraph 153 which states:-</p> <p>"Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development."</p>
Elizabeth Burt	Savills	Crest Strategic Projects		<p>Characters map, page 37 – This map identifies that the Kilnwood Vale site is covered by a landscape character edge designation. There does not however appear to be any identification or definition of what this is. The site is an allocated site for a new neighbourhood and has consent for approximately 2,500 dwellings. It is therefore unclear why this designation has been placed on the site and CSP requests its removal.</p>
Alyson Jones	Barton Willmore	SEGRO	CH11	<p>It is not clear as to the basis for the designations that have been identified on the Proposals Map, which only refers to 'studies', from which it is not possible to discern which studies relate to these particular policies. A clear justification for each of the designated views should be provided to understand the particular characteristics that the Council is looking to preserve.</p> <p>The Policy wording indicates that verified view montages and cross sections will be required in order for the visual impact of proposals affecting these important views to be demonstrated. It should be clarified that proposals, which do not cross or directly obstruct the view, will not require such onerous requirements to be fulfilled. For example, it would be inappropriate for development within the designated Manor Royal Business Estate that fronts onto one of the corridors, but does not sit within the corridor, to have to provide such evidence, given that the view follows the road corridor and not the land adjacent. Such requirements could unnecessarily stifle economic regeneration in the area.</p>

Name	Organisation	On Behalf of:	Policy:	Character Comments
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Future development of the town should protect and enhance the role of neighbourhoods and their centres.</li> </ul> <p>Natural England agree the role of neighbourhood centres should be enhanced as this promotes local accessibility to services and amenities throughout the Borough.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• The future design of buildings should reflect the existing character of the town. New development should not look out of place in the new town setting.</li> </ul> <p>Natural England agree that the design of building should reflect local character, but emphasise that the natural environment also has a role to play in delivering local distinctiveness and a sense of place.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Several areas have been identified in the Local Plan for their “special architectural interest or character.” It is important to protect these areas by designating them as Conservation Areas.</li> </ul> <p>It is not within the remit of Natural England to comment on architectural importance.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Within the town, there are specific views and landscapes which the council believes should be protected for future generations. These are thought to add character to the town and any new development should not obstruct them.</li> </ul> <p>Natural England would wish to see further details and evidence of consideration of all landscapes in accordance with the Landscape Convention.</p>
John Lister	Natural England		p.40	<p>Natural England notes and encourages the importance that is given to the protection of the countryside in the policy justification text of chapter 6 which states: ‘Crawley’s countryside is an extremely valuable asset for the community, which should be conserved and enhanced in a positive way. This must be integrated with the need to achieve the wider vision and objectives, and the local plan will support sustainable development within the countryside’.</p> <p>Natural England notes that, in securing sustainable development objectives, there may be a need to develop areas that impact on views and landscapes that are considered important. A fine balance of ensuring sustainable development and protecting identified views and landscapes will require careful justification across the entire spectrum of the sustainable development agenda, including the consequences of climate change upon such landscapes.</p> <p>Furthermore a presumption in favour of sustainable development is highlighted within national guidance the NPPF, as the golden thread which should be seen to run through both plan-making and decision taking.</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Character Comments
John Lister	Natural England		CH1	Natural England welcome the aim within policy CH1 to maintain a clear pattern of land uses and whilst urban design issues lie outside the remit of Natural England, the encouragement to create public spaces and attractive routes to ensure places are connected for all members of society are aspects that are supported and encouraged by Natural England since this contributes towards a more sustainable development; by increasing choice in movement and reducing the reliance on the private motor car.
John Lister	Natural England		CH3	Natural England support the emphasis within policy CH3 to ensure important features such as views, landmarks, rights of way, trees, open spaces and footpaths are integrated, protected and enhanced within any new developments. Natural England consider each factor helps to deliver a more sustainable development, by providing a choice of access thus reducing the reliance on the private car, and by providing for biodiversity by integrating existing green attributes within development proposals.
John Lister	Natural England		CH12	Natural England support the protection of the countryside and natural environment as detailed within policy CH12. It is clear that points i-ix within policy CH12 aim to protect and enhance the natural environment that surrounds the built up areas of the Borough. Furthermore, within the justification text, it is detailed that; in order to ensure development respects the unique landscape area in which it is proposed there may be additional policies for each landscape area. This will provide an opportunity to be more prescriptive as to the development that is acceptable on a place by place basis.

## Category 4: Economic Growth

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	EC1	Similarly Policy EC1 which encourages economic growth is also supported.
	Crawley Young Persons Council			<p>Better town centre?</p> <ul style="list-style-type: none"> <li>· Some members felt there was not enough security in the town centre during the night</li> <li>· More restaurants in Queens square was suggested and supported by many members</li> <li>· Drop in youth centre was suggested</li> <li>· More colour around town?</li> <li>· A possible mall card offered to customers to gain discounts after spending a certain amount of money in stores within County Mall?</li> </ul>
	Crawley Young Persons Council			<p>Do you see yourself living in Crawley in the next 10 years?</p> <ul style="list-style-type: none"> <li>· Many members felt they wouldn't want to live in Crawley after finding a job.</li> </ul> <p>Argued that there are better job opportunities in big cities such a London.</p>
Andy Evans	Miller Homes			<p>The plan provides no guidance as to the level of new sites for economic development which need to be identified or indeed the criteria by which any such proposed sites might be judged (other than reference to NPPF). The issue is simply stated that there is no suitable land not protected for other uses. We consider the plan to be wholly inadequate in this regard. Without an understanding of the economic pressures for further expansion and balancing this against other constraints, the plan cannot be said to have been positively prepared and would be unsound. We note the employment land studies undertaken to inform the plan which recommend further site allocation on both quantitative and qualitative basis but those conclusions do not seem to have fed into a positively prepared policy framework for the new plan.</p> <p>We would also note that should land east of Brighton Road be eventually found unsuitable for residential development, land within that broader area at Old Stone Cottage is eminently suitable for an extension to the adjoining Business Park providing a highly accessible addition to the potential stock of employment premises.</p>
Andy Evans	Miller Homes			<p>The plan provides no guidance as to the level of new sites for economic development which need to be identified or indeed the criteria by which any such proposed sites might be judged (other than reference to NPPF). The issue is simply stated that there is no suitable land not protected for other uses. We consider the plan to be wholly inadequate in this regard. Without an understanding of the economic pressures for further expansion and balancing this against other constraints, the plan cannot be said to have been positively prepared and would be unsound. We note the employment land studies undertaken to inform the plan which recommend further site allocation on both quantitative and qualitative basis but those conclusions do</p>

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				<p>not seem to have fed into a positively prepared policy framework for the new plan.</p> <p>We would also note that should land east of Brighton Road be eventually found unsuitable for residential development, land within that broader area at Old Stone Cottage is eminently suitable for an extension to the adjoining Business Park providing a highly accessible addition to the potential stock of employment premises.</p>
Martyn Chase	Stanhope plc			<p>The Local Plan will play a vital role in setting the appropriate planning context for major regeneration projects that are essential for the realisation of this vision. Stanhope, as the Council's development partner at Town Centre North, supports the identification of Town Centre North as an area of opportunity with the potential to deliver the on-going vision for high quality jobs, homes and shops, and make the Town Centre an attractive place to be. In addition Stanhope endorses that the Local Plan aims to give investors in the Town Centre confidence by reinforcing the town centre first thrust of national planning policy guidance and restricting competing retail development that may be proposed outside the town centre.</p>
Martyn Chase	Stanhope plc		EC2 & EC3	<p>The Local Plan makes reference to the approach for the Town Centre being to prioritise retail over other use classes (p.58); Stanhope are supportive of this position but given the extent of the town centre boundary would like to see a continued emphasis on retail development of any scale being directed toward Town Centre North. Other use classes may take preference in the non-core areas (secondary shop frontages) within the wider town centre so as not to impact on the viability and vitality of the retail heart of the town centre. This is recognised in Policies EC2 and EC3 but could be enhanced; and could in addition recognise the changes that could take place in the various town centre locations during the life of the Local Plan following on from the delivery of Town Centre North and any consequential changes in retail capacity</p>
Martyn Chase	Stanhope plc			<p>The recognition of primary and secondary streets is a connected issue (p.64), flexibility is sensible in the consideration of the frontages, although the Town Centre North proposals will likely enhance the Broadway as a retail destination and this should be recognised in the Local Plan. To this effect we would also like to see the boundary of Town Centre North in the Proposals Map to include 2-16 The Boulevard and 4 – 12 The Broadway as this will be an important gateway into the new scheme from the High Street and the existing Broadway.</p>
Martyn Chase	Stanhope plc		EC2	<p>Policy EC2 allows for a phased delivery of sites within Town Centre North; we support this in respect of the variety of uses that will be pursued within the wider site boundary, but would re-enforce that any site proposals that come forward should in no way prejudice the delivery of the core retail phase.</p>

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
Martyn Chase	Stanhope plc		EC5	We welcome Policy EC5 and its priority to Town Centre North and the wider town centre against Non Central Retail Development. It is our view that any developments of this type will undermine the Town Centre and prejudice the ability to bring forward a comprehensive development of Town Centre North.
Martyn Chase	Stanhope plc		EC8	Policy EC8 steers leisure uses to Crawley Leisure Park, The Hawth and K2. We consider that (as recognised in the reference to the NPPF) town centre sites should also be considered prior to out of centre locations, in order to help create and enhance a family orientated leisure and evening economy.
Peter French	WYG Environment Planning Transport Ltd.	Sainsbury's Supermarkets Ltd.	Sainsbury's Supermarkets Ltd.	<p>Whilst Sainsbury's encourages the development of both town centre and edge of centre sites in order for Crawley to enhance its role as a Primary Regional Centre, part of the wording of Policy EC3 'Town Centre and Edge-of-Centre Development Sites' is contrary to the requirements of both the National Planning Policy Framework (NPPF) and the practice guidance of Planning Policy Statement 4 (which remains valid guidance). The fourth paragraph of Policy EC3 as currently proposed reads as follows:</p> <p>"Developments on edge-of-centre sites should not contain any material net gains in retail floorspace unless specifically identified. Further guidance on the Council's aspirations for each of the above sites will be set out in separate development principles statements."</p> <p>The NPPF states at paragraph 24 that 'Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale'.</p> <p>The NPPF makes it clear that no development proposing main town centre uses should be prejudiced in edge or out of centre locations – including retail – provided that the sequential approach is satisfied, and provided the proposals would not have a significantly adverse impact on the vitality and viability of protected retail centres.</p> <p>Therefore, rather than stating that there should be no net gains of retail floorspace in edge-of-centre sites, the policy should reflect the wording contained within the proposed policy EC5 'Non-Central Retail Development'. This requires applicants to demonstrate that the need for the development cannot be met on more central sites, having applied the sequential test, and also show that the impact</p>

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				<p>of the development will not undermine the vitality and viability of the town centre or neighbourhood centres.</p> <p>We therefore suggest the fourth paragraph of Policy EC3 is reworded as follows:</p> <p>“A net increase in retail floorspace in edge of centre development will be permitted, provided the applicant can demonstrate through the sequential test that there are no sites in the town centre that are available, suitable and viable for the proposed development, and can demonstrate that the proposals would have no significantly adverse impact on the vitality and viability of the town centre or neighbourhood centres. Further guidance on the Council’s aspirations for each of the allocated development sites will be set out in separate development principles statements.”</p> <p>Rewording the policy as such not only brings the policy in line with national policy set by the government, making it ‘sound’, but will also ensure that development opportunities close to the defined primary shopping area are not lost. Such development may not only help to enhance the town’s role as a Primary Regional Centre, but may also strengthen the viability of the Town Centre North scheme in the future. It would also allow new retail development to come forward in the town at a time when allocated development sites may not be available in the short to medium term.</p>
Karen Calkin	RPS Planning & Development	Costco Wholesale Limited	EC6	<p>SEE REP FOR MORE INFO - SEE REP FOR MORE INFO</p> <p>- This representation supports Policy EC6 (Manor Royal Masterplan &amp; Spatial Strategy) which promotes Manor Royal as an economic hub and where sustainable 'economic development' will be encouraged. The policy makes reference to employment generating uses. For clarification it is suggested that the Plan includes a definition of Economic Development within the glossary inline with the NPPF's definition of Economic Development:</p> <p>“Economic Development – Development, including those within the B Classes, public and community uses and main town centre uses (but excluding housing development)”</p> <p>Policy EC6 also sets out a number of criteria where development proposals for the reuse and intensification of land for employment generating uses within Manor Royal will be permitted.</p> <p>The Council is aware that the Costco is seeking representation in the Crawley area and that Costco are specifically interested in locating on Manor Royal. This would be the first wholesale warehouse club in Crawley. Warehouse clubs are a new and emerging sector of wholesaling. In recognition, and in accordance with the NPPF paragraph 21, Crawley Borough Council should recognise this emerging sector and positively plan for it accordingly. RPS therefore requests that a new criterion is added to Policy EC6 as follows:</p>

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				"f) are for sui generic warehouse club provided that the sequential and impact tests of the NPPF are met."
Cath Rose	Reigate & Banstead Borough Council		EC1	We have previously commented on proposals for Town Centre North (TCN), and subsequently had positive discussions at an officer level to seek to ensure complementarity between TCN and our plans for Redhill town Centre. We support the growth of Crawley town centre, however also suggest that it would be appropriate for the Plan to clarify, in broad terms, the anticipated phasing of development at Town Centre North. This would ensure that the complementarity of proposals for both Crawley and Redhill can be more clearly demonstrated and understood.
John Adams	Drivers Jonas Deloitte	Shearer Property Group	EC5 & EC6	In brief, SPG object to Policy EC6 on grounds that Criteria C contains an arbitrary definition of the maximum amount of retail that will be permitted at Manor Royal (i.e. 300 sqm). This reference to 300 sqm is not, to the best of our knowledge, supported by robust evidence and in the context of Manor Royal – one of the largest business districts in the South East – is unreasonable, as it would serve to restrict proposals substantially larger than 300 sqm which have the potential to be genuinely ancillary to the business function of the estate. Each application for retail development in Crawley must be considered on its own merit and against the retail policies as defined by Policy EC5 of the Preferred Strategy. They should also have regard to the potential contribution of each individual proposal to the economic growth of Manor Royal and to the town as a whole. The test that should be applied here is whether or not the proposed retail uses would result in a shortage in supply of employment uses and indeed whether or not they would serve to restrict the operation of existing adjacent properties and / or their potential redevelopment. There is also a conflict between Policy EC5 which allows for retail development to come forward in out of centre locations provided the relevant criteria are met and Policy EC6 which provides an absolute restriction on retail in this location above a certain threshold. Policy EC6 should be amended to delete Criteria C.
Wakako Hirose	Rapleys LLP	T&L Crawley LLP	EC1	Policy EC1 suggests that the Council will support new economic activity and associated regeneration where proposals accord with specific roles allocated for the designated employment areas. The role identified for Manor Royal is to provide "the first choice for office, industrial warehousing in the south east." This clearly does not reflect the status of my client's site (BRETTS WAY), where the Council has already accepted the principle of non-B class use through its approval of retail use. In these terms, we strongly object to the proposed Main Employment Area designation for the Betts Way site. This approach is entirely in line with the National Planning Policy Framework (NPPF), which indicates that planning policies should avoid long term protection of sites allocated for employment use where there is no reasonable prospect of

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				a site being used for that purpose.
Wakako Hirose	Rapleys LLP	T&L Crawley LLP	EC6	Policy EC6 encourages sustainable economic development, including “employment generating uses” in Manor Royal. However, I object to criterion c, which sets a threshold of 300sq.m of Class A1 retail floorspace that is permissible in Manor Royal, which is considered to be too prescriptive. The Local Plan should continue to adopt a flexible approach to the use/reuse of employment land for alternative uses, including retail, that provide economic growth opportunities for the town. It should be noted that this is contrary to the NPPF, which requires Local Authorities to set an economic vision and strategy which positively and proactively encourages sustainable growth, through policies that are flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. In these terms, the 300sq.m threshold should be removed and the policy should advise that retail development is permissible subject to satisfying the retail tests of the NPPF.
Wakako Hirose	Rapleys LLP	T&L Crawley LLP		In summary, I consider that the Local Plan should continue to protect the existing employment land, in select locations, where there is an identified need. This should not, however, be at the expense of adopting a more flexible approach elsewhere. The Local Plan needs to positively respond to changing economic circumstances, when considering appropriate alternative uses, which contribute to Crawley’s economic growth. As part of this process, my client’s site should be allocated for retail use.
Brenda Burgess				Fewer office blocks unless we know they are going to be occupied.
Michael Fearn	Shireconsulting	Barclays Bank plc	EC4	SEE FULL REP -  The Council’s objectives will require major commitment and substantial investment by the private sector. Pursuing restrictive policies to keep significant generators of footfall such as the Bank out of primary shopping frontages will actively work against the achievement of those objectives and is an outdated and discredited approach. The ‘Plan for Growth’ set out the Government’s determination that planning policies and their implementation must facilitate economic investment and growth, a policy now reinforced in the NPPF. The Local Plan must therefore follow the approach set by national policy in respect of retail frontage policy by revising Policy EC4 to provide that support for investment by stakeholders such as our Client and to ensure that the local plan is sound.

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				Arbitrary planning policies designed to restrict generators of footfall such as the Bank in primary shopping frontages will actively work against the achievement of the Council's objectives and is inconsistent with national policy. The Bank's evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration or investment. To be Justified and Consistent with National Policy, Policy EC4 must be revised to remove the arbitrary restriction on the presence of financial service retailers such as the Bank in designated frontages. If this is not done, the Council will risk the DPD being found unsound. Policy wording should make it clear that uses such as shops, banks and building societies which contribute to the vitality, viability and diversity of town centres will be encouraged and that such active ground floor uses will be appropriate in primary frontages without restriction.
Sally Stallan	Horsham District Council			In terms of economic growth, we see that you are focussing future development on Manor Royal, Three Bridges employment corridor and Maidenbower Business Park, all of which are existing employment sites, with the aim to improving them. We note that you are not seeking to allocate any additional sites for employment use. We also note the policy approach to office use – directing this out of the town centre to Manor Royal, which although is contrary to the guidance contained within the National Planning Policy Framework; we note that there is local justification for this approach.
Sally Stallan	Horsham District Council			We note that an objective of the plan is to reinforce Crawley's role as a competitive regional shopping centre. To achieve this, the strategy seeks to deliver a step change in retail development to enhance the town centre. Whilst we recognise the growth may be needed to ensure Crawley maintains that regional status, this should be planned in a complementary manner to the role that other town centres in the region perform. This is recognised in the introduction of the document with reference to the Gatwick Diamond Local Strategic Statement. We welcome ongoing discussions about the complementary and supportive role of Horsham town centre but suggest this could be mentioned in the main body of the strategy.
Peter Mason	Tandridge District Council		EC1	If Gatwick Airport is to expand to 45 million passengers per annum, robust environmental safeguards will be needed.
Peter Mason	Tandridge District Council		EC2	It is considered that the enhancement of the Town Centre should result in it having a role as a major public transport interchange serving the Gatwick sub-region leading to an improvement in the quality of existing facilities.

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
Tim Hoskinson	Savills	Wilky Group	EC1	As stated in our comments on Policy STRAT2, there is a clear need for a strategic employment allocation in recognition of Crawley-Gatwick's strategic economic hub role. The supporting text highlights the need for planning policies to enhance the diverse economy of the town to encourage a range of new development from small start up units to major headquarters, however the approach currently set out in Policy EC1 is focused on existing employment areas and will not deliver the wider economic objectives for Crawley and the Gatwick Diamond.... SEE REP FOR MORE
Tim	Savills	Wilky Group		A strategic employment allocation at Gatwick Green would achieve a high degree of consistency with local, sub-regional and regional policy. The development would promote and fulfil all relevant important economic development objectives whilst responding to local requirements with respect to employment, health and education, transport provision and sustainable development. Significantly, Gatwick Green is uniquely well placed to deliver the range of aspirations set out in the Gatwick Diamond Futures Plan. 86. The draft Local Plan does not address either strategic or location specific proposals for a high quality B1 business hub and innovation park along the lines proposed at Gatwick Green, either as a concept or locationally at Gatwick Green. Without such provision, the plan is considered unsound.
Mark Bewsey	Savills	Homes and Communities Agency	EC2	Comment – The HCA welcomes CBC's aspiration to achieve a major mixed use redevelopment in the Town Centre North area. Given the status of Crawley as a Regional Hub and the major Town Centre in the Gatwick Diamond, it is key that the most efficient and effective use of land is made. Accordingly the HCA urges CBC to promote high density development through policy HC2. The HCA is keen to work with CBC as a key landholder and wishes to promote the Kilnmead site within the Town Centre North Area for residential development.  The Kilnmead site occupies an ideal location for a residential development as it sits amongst residential dwellings and to the south of the residential hinterlands of north Crawley. The site is previously developed land and occupies a central location within the Town Centre boundary and the town centre north major mixed use development allocation.
Mark Bewsey	Savills	Homes and Communities Agency	EC3	Support – The HCA agrees that Crawley Town Centre should be promoted as a sustainable and desirable place to live, and welcomes the emphasis on the provision of housing as a key aspect of the mixed-use development opportunities identified. The encouragement of the mixed-use development of under-used land within the Town Centre Boundary is also welcomed.
Mark	Savills	Homes and	EC4	Comment – In order to further improve the vitality and

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
Bewsey		Communities Agency		viability of Crawley Town Centre, it is vital that an appropriate mix of uses is encouraged. This can be partly achieved through increasing the number of people living within the town centre to ensure the area is active at all times of day. The provision of well design residential accommodation can also help to reduce anti-social behaviour through natural surveillance resulting in overlooking of public areas from windows and balconies. The HCA therefore suggests that policy EC4 should be amended to promote residential use of under-used peripheral town centre sites.
Mark Bewsey	Savills	Homes and Communities Agency	EC6	Comment – The HCA has significant landholdings on the edge of the Manor Royal Business District at Rowley Farm. This land falls within the Gatwick Safeguarding Area so is therefore currently unable to be developed. The constraints posed by the safeguarding area should be recognised within the emerging Local Plan and text within the Reasoned Justification section on page 68 be amended to: “There is no new land to allocate in the borough due to its physical constraints, compact urban area and the restrictions of the Gatwick Safeguarding Area.”
Elizabeth Burt	Savills	Crest Strategic Projects		CSP supports the Council’s aim for Crawley to continue to be an economic leader with the provision of a business environment that supports and encourages new and established businesses to grow. It must however be recognised that this will need to be supported by the required number and mix of housing to ensure a balanced and successful economy can be achieved and sustained.
Alyson Jones	Barton Willmore	SEGRO		The Preferred Strategy consultation document primarily deals with Manor Royal within the Economic Chapter (page 55 onwards) where Manor Royal is referred to a ‘A premier mixed-use location for business’. The estate is confirmed as the key employment location to serve Crawley and the wider area, whilst acknowledging that there is a case, including responding to market demand, for other uses to be allowed, so long as it is at a scale ancillary to the traditional Class B employment business function of the business estate. SEGRO do not support this approach which is considered likely to stifle development and be counter-productive over the medium term, as set out below.
Alyson Jones	Barton Willmore	SEGRO	Key Diagram	It is not considered appropriate to include the Manor Royal Gateway Sites on the key diagram given that the diagram, in all other respects, only includes very high level broad areas of land uses. It would be more appropriate for the Manor Royal Gateway Sites to be included on the Northgate Neighbourhood Plan (page 175) (it would also be helpful if the Neighbourhood plans could have titles for ease of reference) or the Proposals Map.  The status of the Key Diagram is not clear as there is no definition or cross-referencing of either the Key Diagram or the Proposals Map.
Alyson Jones	Barton Willmore	SEGRO	Proposals Map	It is not clear from the list of contents that the Proposals Map is part of the Local Plan document and there is no

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				definition as to its status within the Local Plan draft document.
Alyson Jones	Barton Willmore	SEGRO	EC1	<p>SEE FULL REP....</p> <p>SEGRO would urge CBC to think more flexibly about development opportunities across Manor Royal and the ability to introduce complementary uses and development which is supported by market demand. Manor Royal has scope to accommodate leisure, retail and other employment generating and complimentary uses and the Local Authority should positively look to embrace this opportunity and not discourage it.</p> <p>It should also be made clear that whilst the Local Plan seeks high design standards at key gateway sites and frontages, that this should not undermine or result in potential land uses being rejected on the basis that they cannot deliver for example land-mark office buildings, and that such sites, provided they are for an economic development activity, will be supported provided the overall design standard is appropriate.</p>
Alyson Jones	Barton Willmore	SEGRO	EC1	<p>SEE FULL REP....</p> <p>SEGRO would urge CBC to think more flexibly about development opportunities across Manor Royal and the ability to introduce complementary uses and development which is supported by market demand. Manor Royal has scope to accommodate leisure, retail and other employment generating and complimentary uses and the Local Authority should positively look to embrace this opportunity and not discourage it.</p> <p>It should also be made clear that whilst the Local Plan seeks high design standards at key gateway sites and frontages, that this should not undermine or result in potential land uses being rejected on the basis that they cannot deliver for example land-mark office buildings, and that such sites, provided they are for an economic development activity, will be supported provided the overall design standard is appropriate.</p>
Alyson Jones	Barton Willmore	SEGRO	EC5	<p>As noted above, there is a contradiction between Policy EC5 which allows for retail development in non Town Centre locations subject to a number of tests, and Policy EC6 Manor Royal which looks to specifically restrict retail provision. Policy should be clarified to allow for larger scale retail and leisure development than that allowed under Policy EC6 at Manor Royal, provided the tests are met. This should also be clarified under Policy EC6.</p> <p>SEGRO considers a balanced approach needs to be taken and where proposals for other parts of the borough are brought forward by the development industry the approach of CBC, and other statutory consultees, should be supportive until it becomes clear that a proposal would not be acceptable because of consequential impacts that are deemed unacceptable. Any other approach would risk losing investment at a time where investment and jobs</p>

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				<p>should be welcomed.</p> <p>To this end, Manor Royal has several sites, including those owned by SEGRO, where there is potential to broaden land uses to include appropriate levels of retail, leisure, other employment generating uses, and other complimentary uses. This would not only respond to market interest shown, secure investment, jobs and regeneration for Manor Royal, but if carefully managed could be achieved in a way that supported rather than competed with the town centre. The alternative is to see such sites remain under utilised and vacant for an indefinite period.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>Manor Royal is the largest business area in the town. We should encourage the area to remain a business district?</li> </ul> <p>It is not within Natural England's remit to comment on this</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>There should be guidelines which aim to smarten up the look and feel of the Manor Royal area. These guidelines could relate to the main gateways and roads through Manor Royal or to the area as a whole. Do you agree? What should the guidelines apply to?</li> </ul> <p>Main roads and gateways into Manor Royal or; Everywhere within Manor Royal</p> <p>Natural England support the statement within the Economic Growth chapter (p 56); 'central to achieving the vision for Manor Royal, is the delivery of qualitative improvements to the environment through the implementation of high design standards at key gateway sites and frontages and through the support of inward investment.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>The Local Plan should limit retail development outside the town centre</li> </ul> <p>Natural England support this sentiment as locating retail development in town centre areas promotes sustainable development objectives particularly in terms of accessibility to sustainable modes of transport.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>The council should continue to protect neighbourhood parades for uses that serve the needs of the local community</li> </ul> <p>Natural England support the protection of neighbourhood parades as this helps to maintain accessible local services and amenities and may reduce car based travel.</p>
John Lister	Natural England			<p>The Local Plan recognises that alongside the Manor Royal Business District there are other areas which support the economy of the town. These include Three Bridges, Maidenbower Business Park, Tilgate Forest Business Centre and Broadfield Business Park. In future these areas should be protected for employment purposes</p> <p>It is not within Natural England's remit to comment on this</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
John Lister	Natural England		EC1	Natural England welcome the comment; 'Development proposals that create new economic activity and associated regeneration of the built environment will be proactively supported.' The regeneration of previously developed, urban areas will reduce the pressure on greenfield land for new development. These urban areas are also generally more sustainable locations for economic development as they are closer to infrastructure hubs and other existing services and amenities.
John Lister	Natural England		EC4	The emphasis within policy EC4 to ensure effective use of upper floors within the town centre boundary for retail and residential use is supported by Natural England as this promotes a more sustainable use of space and helps to reduce the pressure on greenfield sites as locations for new development.
John Lister	Natural England		EC3	Natural England support the redevelopment of "outworn buildings" so long as they are within suitable locations as this may help to reduce the reliance on greenfield sites for new development. Redevelopment of brownfield areas is not appropriate on sites of high environmental value particularly as some sites may have an increased ecological value.
John Lister	Natural England		EC5	Natural England notes the Borough's attempt to encourage retail development to be located on appropriate, central sites. Within policy EC5 it is encouraged that new retail development is situated within; <ul style="list-style-type: none"> <li>• The primary shopping area or High Street</li> <li>• Appropriate sites identified under Local Plan policies EC2 and EC3</li> <li>• Neighbourhood centres</li> </ul> Where new retail is proposed in other locations it will only be permitted where; <ul style="list-style-type: none"> <li>• The need for development cannot be met on more central sites; having applied the sequential test</li> <li>• The impact of the development will not undermine the vitality and viability of the town/neighbourhood centres</li> </ul> Natural England consider retail development to be better suited in locations where there is a choice of transport modes and other services available within close vicinity.

## Category 5: Housing

Name	Organisation	On Behalf of:	Policy:	Housing Comments
Ian Miller	Tinsley Lane Residents Association		H2	<p>Tinsley Lane is a discrete residential area bounded on two sides by the Manor Royal Business District and separated from Pound Hill and the rest of Three Bridges by the railway line and Crawley Avenue motorway link road. Within these defined boundaries, and with a mix of housing styles, many dating from before the New Town, it has developed a village like community with a strong local identity which should be protected and enhanced within the Local Development Framework. The unique semi-rural characteristics of Tinsley Lane should thus be protected by designating it to be an Area of Special Environmental Quality.</p> <p>Shielded from the railway line by Summersvere Wood (protected Ancient Woodland and home to a range of wild-life) this area could be utilised as a valuable recreational facility by the addition of nature trails etc. There are also three sports fields (two leased by Oakwood football Club) owned by the Homes and Communities Agency, which have been identified as having development potential.</p> <p>Oakwood F.C. has several boys and girls football teams covering all age groups and provides an extremely valuable service in developing our young people but it needs more funding to bring its facilities up to modern standards. This was discussed with the previous owner, English Partnerships, and a draft development plan was proposed in 2003 to build houses on the north sports field while maintaining the southern half for recreation. This plan was however not considered to be viable at the time.</p> <p>Ideally these sports fields could be retained for recreation with enhanced facilities at Oakwood F.C. to include an open play area for children of residents. If this is not possible then a sustainable low density development project could be economically viable if a commuted payment from the development could be allocated to redevelop the Oakwood F. C. facilities in recognition of the contribution they make to the youth of the Borough. A low density would be necessary to avoid overloading the drainage and sewerage systems which are already close to capacity and the only practical traffic access would not be able to cope with any increase in usage without considerable adverse effect on existing properties.</p> <p>As the LDF has identified a shortage of skilled labour and of family homes this small site could be allocated for low level aspirational housing which respects the character of the surrounding area and minimises the impact on the adjacent bungalows.</p> <p>The proximity of the Manor Royal Business District makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the site ideal for family housing.</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				With new recreational facilities centred on Oakwood football Club, Tinsley Lane could become a distinct individual area of Special Environmental Quality of which Crawley could be proud.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	STRAT3	<p>The National Planning Policy framework (NPPF) requires local authorities to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area' ( NPPF paragraph 47).</p> <p>The Spatial Development Strategy set out on page 15 of the Crawley 2029 Preferred Strategy recognises this as 8,100 dwellings from 2014-2029 from Scenario A in the evidence base. This document also set out ranges from under 5,250 dwellings to 9,450 dwellings over the same period. This latter figure is likely to meet the current local projection of housing need and demand but is also likely to lead to pressure for inward migration and a mismatch between the provision of new homes and jobs. Whilst a rate of 400 dwellings per annum has been achieved over the past 20 years (equivalent to 6,000 over the plan period), the evidence base shows that 550 dwellings per annum (equivalent to 8,250 over the plan period) is likely to support most demographic needs including migration and is therefore the most sustainable. Policy STRAT3, which aims '...to positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible...' is therefore welcomed.</p>
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		As set out in previous submissions housing provision below 450 dwellings per annum (6,750 from 2014-2029) will not meet the full demographic based requirements, affordable housing needs or demand from in migration and will lead to a dysfunctional housing market in that a vacancy rate of 3% is considered to be an appropriate, healthy rate of vacancies, ensuring a dynamic housing market.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		However, the preferred strategy only seeks to find 3,550 dwellings to 2029 and is therefore in conflict with the NPPF's requirements, the local evidence base and likely, therefore, to be found unsound.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		<p>It is noted that the Council undertook a boundary review to assist in identifying new sites for development and other uses. Whilst some land around the western fringes has been identified as having some potential, and that potential is not quantified precisely, it is considered this will not meet the identified shortfall. Given this, it is surprising that part of the land south of Antlands Lane which falls outside the airport safeguarding zone and adjacent to the north east sector, was not considered as part of the boundary review. This omission calls the soundness of this work into question and it should be reviewed accordingly.</p> <p>The owners of land south of Antlands Lane have previously submitted information that demonstrates that the site has no transport, landscape or ecological constraint that would</p>

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				preclude its development. That work also established that the site is within a sustainable location suitable and capable of accepting further development. The south eastern corner lies outside the airport safeguarding zone.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		As set out in Section 2 above, it is considered that provision of 8,100 dwellings from 2014-2029 is the most sustainable and appropriate level of growth in order for the Preferred Strategy to be found sound.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		The identified deficit in housing supply needs to be addressed in line with the strategy of locating development in sustainable locations that are not physically constrained. In seeking to meet this deficit it is clear that land south of Antlands Lane can assist in meeting the shortfall in a sustainable manner, in accordance with the spatial strategy.
James Stevens	Home Builders Federation Ltd		H2	SEE FULL REP. "It is unclear why the housing requirement of 3,543 net dwellings over the plan period has been chosen by the Borough as an appropriate figure (see Policy H1: Housing Provision) as this does not correspond to any of the scenarios that have been outlined..." in the Locally Generated Housing Needs Assessment.
James Stevens	Home Builders Federation Ltd			Page 15 of the Preferred Strategy Local Plan indicates that the Borough considers that the objective need is for circa 8,100 homes. We would concur with this, derived as it is from the 2008-based household projections. This would therefore indicate that there is a shortfall in provision in the plan of some 4,600 homes. The question is whether this unmet need can be accommodated elsewhere and what steps the Borough has taken to try and broker agreements with neighbours to achieve this.
James Stevens	Home Builders Federation Ltd			SEE FULL REP. "...We would expect to see a plan prepared by Crawley that sets out how it has endeavoured to secure agreements with its neighbours to accommodate some of its shortfall of 4,600 homes. Crawley must also consider whether some of its designations and restrictions on development are still appropriate in the interest of accommodating a higher housing requirement. It should ensure that the Sustainability Appraisal assesses the potential benefits or disbenefits of loosening policy constraints and that the residents of the district are aware of the options and drawbacks of not meeting the objective need."
James Stevens	Home Builders Federation Ltd		H4	I have been unable to locate a Local Plan Viability Assessment that considers whether the proposed policy rate of 40% affordable housing, and other policies in the plan, can be achieved, without impacting upon viability and therefore the delivery of the plan. Preparing a viability assessment is required by the Framework (paragraphs 173-177). If you would like me to meet with the Council to provide some assistance on this question I am happy to help.

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Andy Evans	Miller Homes		H1	Policy H1 proposes a net increase of 3545 dwellings 2014-2029 equivalent to 236 dwellings pa. This level of development falls well below any reasonable assessment of housing requirement by NPPF. While some employment forecasts generate a lower housing requirement, such forecasting does not remove the needs of the population for suitable accommodation. Moreover, the existing high levels of in commuting to Crawley suggest that housing provision ought if possible to try to better balance housing and employment such that low growth forecasts should not equate to low housing provision even if economic forecasting were the prime driver of housing requirement – which it is not. As a result we would expect to see a thorough examination of opportunities for accommodating levels of housing closer to indicated requirements that proposed under H1 before any conclusion could be reached that H1 provision is appropriate. We do not consider the SHLAA achieves this and refer to the land east of Brighton Road as one such opportunity where potential to deliver additional housing has not been fully explored. There is also very little information regarding how needs unmet within the Borough can be accommodated elsewhere. Without both elements of such evidence, the plan is likely to be found unsound.
Martyn Chase	Stanhope plc		H2	We note the inclusion of Town Centre North as a Key Housing Site (policy H2) and welcome the possibility of a phased approach to delivery reflective of the commercial requirements and retail priority for the wider site.
Andy Kitchen	Pegasus Group	Persimmon Homes South East	H1	With reference to Paragraph 182 of the National Planning Policy Framework (NPPF) we consider that the preferred strategy set out in the consultation document is not sufficiently 'effective'. Firstly, in taking a 'supply-led' approach to housing provision, the Council is not fulfilling its requirement to 'cater for housing demand and the scale of housing supply necessary to meet this demand' within the district boundary. Paragraph 47 of the NPPF advises that in order to "boost significantly the supply of housing", local planning authorities should "Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework". In situations where development requirements cannot wholly be met within their own areas, the NPPF (paragraph 179) requires local authorities (in the context of the duty to cooperate set out in the Localism Act) to "work collaboratively with other bodies to ensure that strategic priorities are properly coordinated and clearly reflected in individual Local Plans". Such joint working should enable local planning authorities to work together to meet development requirements. The consultation document is very clear in the outlining the stark housing needs but does not currently go far enough in attempting to meet these needs.

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				<p>Secondly, in the face of failing to meet its housing needs the consultation document proposes at Policy CH6 to not review any of the Council's existing design standards for housing development. What the standards are is critical to the delivery of the housing requirement, particularly the Council's garden size standards, which are critically in need of review. The Council must give proper consideration to the impact of retaining the minimum space standards and garden sizes on the delivery of development, as well as development viability. Over-onerous garden standards artificially constrain the mix of development on a site, compromise urban design and increase new-build house prices in the Borough. Crucially they also constrain the number of units which can be delivered from sites. In this context it is considered that the Council could actually deliver more dwellings from its identified Policy H2 sites, were the garden size standards reviewed to encourage the sorts of design approaches encouraged in national planning and design guidance.</p>
Andy Kitchen	Pegasus Group	Persimmon Homes South East		<p>Persimmon Homes support the identification of the site at the former Ifield Community College, which already benefits from Outline Planning Permission for up to 170 dwellings. Persimmon Homes is currently preparing a detailed planning application for the site and would intend to make a start on site promptly once planning permission is achieved. However, due to its over reliance on apartment development and the Council's garden size standards, the 170 dwelling scheme cannot be achieved as envisaged by the illustrative layout the subject of the outline permission, hence the reference to 125 dwellings in the draft policy. Subject to a review of garden size standards and the substitution of the proposed extra care and residential care home facilities with residential dwellings, it is considered that the site could deliver approximately 170 dwellings. We therefore respectfully request the Council to increase the number of dwellings proposed for the site to 170. This would assist in housing delivery and make a greater contribution towards the Council meeting its objectively assessed housing needs and demand.</p>
Cath Rose	Reigate & Banstead Borough Council		H1	<p>We note that the level of constraint within Crawley Borough has prompted the Council to adopt a supply-led approach to setting a housing target, which is lower than figures in the South East Plan and lower than the borough's predicted demographic housing needs. We would expect CBC, through its site allocations work, to take a proactive approach to maximise housing provision within its own area. This should be based on a robust and comprehensive analysis of land supply opportunities. It may also be helpful to include a housing target in the final housing provision policy.</p> <p>RBBC is committed to continued cross boundary co-operation to plan for strategic development needs, including housing. This ongoing work will not only need to take account of the level of constraint in Crawley, but also in neighbouring authorities including Reigate &amp; Banstead.</p>

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				<p>We are a highly constrained borough, with 70% of our total area covered by Green Belt designation, a range of other landscape and nature conservation designations including the Surrey Hills Area of Outstanding Natural Beauty and the Mole Gap to Reigate Escarpment Special Area of Conservation, and severe flood constraints in the small (non-urban) part of the borough that is not designated as Green Belt. Despite this the Council is taking a proactive approach to planning for housing in line with the South East Plan, to meet the housing needs generated by our own population and accommodate some in-migration from neighbouring authorities. The Council has recognised that difficult decisions need to be taken in relation to future housing provision in the borough, including the release of Green Belt land. Even so, our latest evidence highlights the very limited opportunities for sustainable development that exist in the borough (see our Sustainable Urban Extensions: Broad Geographic Locations Technical Paper November 2012).</p> <p>In the parts of our borough closest to Crawley, we are progressing with plans to deliver two new neighbourhoods in providing a total of 2,200 homes. Our recently completed work in relation to opportunities for further urban extensions identifies the extensive nature of constraints around Horley which limit the town's capacity to accommodate further growth. However, this work does also recognise that there may be additional opportunities for further small scale growth in this area, which we are committed to exploring further as we develop our Development Management Policies (including site allocations) document.</p>
Jack Straw	Mole Valley District Council		H1	<p>5. However, we feel we must raise some concerns about the housing figure being proposed in the Crawley Preferred Strategy. Both the Development Strategy &amp; Strategic Policies section and the Housing section of the Strategy report the results of the Locally Generated Housing Needs Assessment and the need for around 542 homes per annum.</p> <p>6. Notwithstanding this evidence, only just under half of that is being planned for. The Strategy does not seem to have followed the advice in paragraph 179 of the NPPF, to ensure that development needs which cannot wholly be met within the area of the plan making authority are addressed through local planning authorities working together. Therefore the question has to be asked; where is the housing that is required to accommodate the needs of Crawley's growing population going to go? How is it being planned for? And what certainty is there that this can be delivered? Does this take into account migration from other areas such as Mole Valley?</p> <p>7. We are very concerned that this level of 'under-provision' could have knock-on effects for the amount of new housing to be provided elsewhere in the sub region/ housing market</p>

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				area.
Jack Straw	Mole Valley District Council		H5	11. Policy H5 indicates that a suitable policy approach will be presented for consultation once the level of need for traveller pitches has been established. It would be helpful to clarify whether this will include the identification of land for new sites/plots and if not, why this is not being addressed in the Local Plan.
Steve Tremlett	Brighton & Hove City Council		H1	<p>Brighton &amp; Hove City Council notes that Crawley Borough Council is making provision for only 236 new homes per year over the Plan period. This is significantly less than required by the still extant South East Plan.</p> <p>The Plan identifies that Crawley is part of the Northern West Sussex Strategic Housing Market (SHMA). However there is considerable overlap between housing markets in the South East. The Northern West Sussex SHMA is adjacent to the Brighton &amp; Hove SHMA which includes Brighton &amp; Hove, and the significant volumes of workers travelling from Brighton and Hove to workplaces in Crawley Borough is indicative of the linkages between the areas. This is reflected in the involvement of Crawley BC in the ongoing officer meetings with BHCC and other authorities in the Brighton &amp; Hove SHMA to address the Duty to Cooperate on this cross-boundary issue.</p> <p>Given that the authorities that comprise the Brighton &amp; Hove SHMA as a whole are not able to provide for the objectively assessed demand, it is important that all reasonable means of maximising housing provision across the area are pursued.</p>
Brenda Burgess				Investigating the transformation of some office blocks to living space. If the old docks can be converted in London and other cities, then why not our obsolete unwanted office block, many of which are new.
Brenda Burgess				Bring forward the green fields of Tinsley lane. I don't just mean the football club. In fact I think that could stay as there are no other facilities for the young in that area. There are other fields owned by HCA - think rented to Rentakill at some point. It might mean adjusting the roads such as bringing through an access from one of the closes. During such a development, or even if one is not possible, we desperately need play areas in the Tinsley lane area. Tinsley lane is surrounded by major busy roads and there is no where locals for children to play safely.
Brenda Burgess				Living in the Town centre? Might not be appropriate to have social housing in the area of Town centre.
Brenda Burgess				Mixture of housing both Social and market desirable.
Iain Painting	Barton Willmore	Bellway Homes Ltd, Devine	H1	SEE FULL REP FOR MORE - "...Regardless as to whether the identified strategic requirement is correct, the council acknowledges that the 3543 requirements set out in H1 will

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		Homes PLC and Reside Developments Ltd.		not meet that need. However, the contribution that such authorities can make and the inter-relationship between authorities has not been identified. There is clearly an absence of co-operation as required by section 110 of the Act and paragraphs 178 to 101 of the NPPF. The draft plan is therefore not sound. Due to the failure to co-operate alone, the plan has not been positively prepared, it is not effective, and hence is not justified nor consistent with national policy..."
Kerry Pflieger	Development Planning & Design Services Ltd	Private Landowner		SEE FULL REP - The landowner supports the inclusion of the North East Sector, Residual Land as a Key Housing Site in the Preferred Strategy Local Plan and can confirm (as explained above) that the site is deliverable, in accordance with paragraph 47 of the NPPF.  The land owner does however contest that the whole of the subject site should be identified as a key housing site in order to enable a comprehensive scheme for the site to come forward rather than a scheme that is dictated by an arbitrary line.
Kerry Pflieger	Development Planning & Design Services Ltd	Private Landowner	H2	the land owner also requests that the working of policy H2 is amended to include the word "approximately" before 100 dwellings to provide scope for a higher level of housing on the site, if considered acceptable following detailed site survey work.
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey		SEE FULL REP - It is a general concern of both my clients that the council has failed to identify sufficient land to meet identified housing needs. It is noted that the councils proposed supply of sites only amounts to circa 240 dwellings per annum when there is recognition that there is a need for 500+ dwellings per annum.  In order to rectify this shortfall it is considered that the additional land should be identified for housing. Whilst this will need to be the subject of a further borough wide review, PH and TW will endeavour to work with officers at the Council to identify additional housing opportunities in and around the consented NEW Sector site where they can be integrated into the master plan for the area.  Officers will be aware that additional housing land was identified in the previous Local Plan and the Core Strategy for the larger neighbourhood of 2,700 dwellings. It is recognised that there are constraints that affect the residual land (in particular Safeguarding and noise from Gatwick Airport) and that the Council has identified land off Steers Lane for an additional 100 units. However it is considered that further development might be possible to the south east of the consented NES Site.
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH6	It is important that Policy H3 and the supportive test allow such matters to be market driven and subject to viability where open market housing is concerned. Whilst the SHMA provides evidence of demand it should be used

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				to dictate the mix that must be delivered on all sites.
Sally Stallan	Horsham District Council			<p>We note that one of the aims for the Local Plan is to provide about 3,550 new homes by 2029. However, your Locally Generated Needs Study (LGNS) indicated a need for 542 new homes per annum (11,379 total) based on a 'natural change' baseline demographic scenario. We understand that this target may not be achievable given the constraints of the physical boundary of the Borough and the limited land available for housing. We also note that your evidence indicates that no population growth would be required in order to enable economic growth within the Borough; therefore the Draft Local Plan puts forward a 'supply-led' approach with a target of 3,543 net additional dwellings in the borough between 2014 and 2029, which equates to 236 new homes per annum.</p> <p>Whilst we recognise that the housing need is reduced through this housing target, it is still not met in full by this option, and is considerably lower than the need identified in your LGNS. As a result we as a neighbouring authority express concern that you are not meeting your housing need. With regards to this we acknowledge that we currently working closely with Crawley Borough Council and other authorities, and in particular those which share the same housing market area (Crawley, Mid Sussex and Horsham) to assess the most appropriate opportunities and potential solutions to the meeting the housing needs in the area. Although we recognise that it may not be physically possible to accommodate all your existing needs within your borough boundary, we expect there to have been and to continue to be an exhaustive search for all possible sites for housing. The planning policies in the strategy should recognise that these sites are a scarce resource which should be developed to their full potential, taking into account environmental constraints. This will ensure that as far as possible Crawley is doing its best to meet its own needs.</p>
Peter Mason	Tandridge District Council		H2	<p>As regards the North East Sector, which will be a new neighbourhood located to the north of Pound Hill, the District Council has a concern relating to the northern boundary. Having the northern boundary further to the south would help to lessen the impact of the proposed development on Tandridge District which is situated to the north east of this key housing site.</p> <p>The District Council has concerns based on strategic movement policy grounds. As far as the Council is aware, it still has not been demonstrated that the proposed development is compatible with the transport infrastructure and environmental character in the area, having regard to the likely level of traffic generation from the site and the adequate availability of alternative transport modes.</p> <p>The proposed development will have a significant cross boundary impact on roads in the District in the vicinity of</p>

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				<p>the North East Sector. For this reason development related benefits should be made including any necessary improvements to the highway infrastructure within Tandridge District in the locality. These improvements would need to include mitigation measures to be carried out to minimise additional traffic in the District using the cross boundary routes in the vicinity of the North East Sector.</p> <p>It is considered that the area should be protected by including any of the undeveloped land at the site in the Gatwick Greenspace Partnership (formerly the Horley/Crawley Management Project). Such land as is included should be assessed for potential enhancement.</p> <p>The final concern of the District Council is that the boundaries of the site should have soft edges. Together with such soft edges should be reduced densities at the boundaries which should help to lessen the impact of the proposed development on the area in general.</p>
Tim Hoskinson	Savills	Wilky Group		<p>This section of the plan highlights concerns regarding a potential imbalance between jobs and housing arising from population increases outstripping economic growth, which may, in turn, exacerbate out migration or out commuting, with people having to move or commute out of Crawley to secure employment.</p> <p>As highlighted in the submitted evidence base for Gatwick Green and in paragraphs 20 to 25 of this document, the proposed jobs growth associated with Gatwick Green would complement existing employment provision in the area and would help to facilitate a more sustainable balance of jobs and population growth by providing more local employment, with opportunities for more people live and work locally rather than commuting.</p>
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd		<p>SEE FULL REP - Attached at Appendix 1 is an Updated Housing Requirements Assessment produced by Barton Willmore using the widely respected Chelmer Model. The Housing Requirements Assessment is updated from the original assessment appended to our representations on housing growth options for Crawley submitted in March 2012. It considers two demographic scenarios and finds that assuming zero net migration an annual average of 512 dwellings are needed in Crawley. However, the second scenario, based on a continuation of short term net immigration trends, results in an annual average need for 850 dwellings in Crawley. It is considered that the two scenarios provide an absolute minimum and a robustly justifiable higher level of housing need for Crawley.</p> <p>Tetlow King has investigated the issue of the need for Affordable Housing and this matter is set out in detail in Section 3 of these representations. If Affordable Housing were continued to be sought at 40% of all new residential</p>

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				<p>development, as in the current Core Strategy, this would suggest the need to build a total of 205-955 new homes each year within Crawley to provide enough affordable housing to satisfy the low and high requirement identified in the SHMA. The Crawley Locally Generated Housing Needs Assessment identifies that a range of between 204-252 affordable dwellings per annum is required to meet affordable housing needs, which is very close to the actual 'supply led' housing target set out in Policy H1. The supply of affordable housing is likely to be adversely affected through the 'supply led' approach referred to below. It is clear, that in order to make a significant contribution to the delivery of homes to meet the growing need for affordable housing, as well as general market housing, Crawley Borough Council will need to consider options outside its boundaries.</p> <p>A New Market Town, between Sayers Common and Henfield on the A23, would provide the best opportunity for delivering improved levels of affordable and other forms of low-cost housing within a mixed and sustainable community. A feature of successful New Towns and more recent new settlements has been a variety of house types and tenures to ensure choice is available and to foster a mixed and sustainable community. A new market town has the ability to deliver more affordable homes than other options, and importantly can provide them in a more sustainable way than, for example, urban extensions.</p>
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd		<p>SEE FULL REP - Lack of Capacity in Crawley to Meet its Housing Need</p> <p>The Preferred Strategy Consultation Draft Local Plan acknowledges that Crawley cannot wholly meet its housing needs within its boundary. Meeting objectively assessed housing need is a fundamental requirement of the National Planning Policy Framework (NPPF).</p> <p>Policy H1: Housing Provision is based on a supply led approach of delivering an annual average of 236 dwellings.</p> <p>In addition to the two demographic led scenarios, the Updated Housing Requirements Assessment considers the dwelling led scenario proposed by Crawley Borough Council based on Policy H1 and its requirement of 236 dwellings per annum. The Updated Housing Requirements Assessment summarises the damaging implications of the 'supply led' preferred option in that it would result in an average annual net out-migration of 588 people, result in very low population growth and would result in very low labour force growth.</p> <p>The above illustrates the importance of Crawley Borough Council proactively identifying how and where the housing needs that it cannot meet with its administrative boundary can be met.</p> <p>The Preferred Strategy Consultation Draft Local Plan does not address how Crawley's unmet housing needs will be</p>

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				met outside of the Borough boundary. These needs are considerable and, excluding an allowance for windfalls that Crawley Borough Council will identify in the Submission Local Plan, range from 4,140 to 9,210 dwellings over the 15 year plan period using the two demographic scenarios referred to above. This is a significant issue and one that is not adequately addressed in the Preferred Strategy Consultation Draft Local Plan.
Mark Bewsey	Savills	Homes and Communities Agency	H1	Object – Policy H1 makes provision for the development of 3,543 net dwellings in the borough for the period 2014-2029. This equates to an average of 236 dwellings per annum. This is significantly below the South East Plan requirement of providing a minimum of 375 homes every year (South East Plan policy H1). ...SEE FULL REP FOR MORE
Mark Bewsey	Savills	Homes and Communities Agency	H2	<p>Comment – In accordance with the comments on draft policy H1, and the site specific representation made by the HCA, the Land East of Tinsley Lane should be added to policy H2 as an additional housing site.</p> <p>The HCA also suggests that it would be good practice to list the SHLAA sites considered to be suitable and deliverable so that there is no ambiguity in regard to the smaller allocated sites. In this regard the HCA wish the Kilmead site, which is clearly suitable and deliverable, to be included as a housing site.</p>
Elizabeth Burt	Savills	Crest Strategic Projects		<p>SEE FULL REP.... In accordance with its previous representations on the CBC Housing Number consultation, CSP considers that a higher level of housing delivery is required if the Local Plan is to meet the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47 of the NPPF). For example Table 1 of the consultation document identifies that for the 'baseline' demographic 'no change' scenario there is a need for 542 dwellings per annum which equates to 8,130 dwellings over the plan period. This is significantly different to the housing figure proposed by the Council in policy H1.</p> <p>CSP strongly recommends that the Council re-assesses its evidence base for housing need and forms its housing target based on this with a robust and clear justification. Housing land capacity is not the correct basis on which to form a housing target. As the Council states the Borough is constrained in terms of the amount of land available for development, the option of delivering some housing outside the Borough boundary is a logical one which needs to be fully explored to assist with meeting the Borough's housing need.</p> <p>With regard to the availability of sites outside of the Borough boundary, CSP can confirm that the site known as land between west of Bewbush and Faygate is available and developable and could contribute towards meeting</p>

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				<p>some of Crawley's growth requirements over this plan period. Details of this site have been previously submitted to CBC and HDC. On this basis it is recommended dialogue takes place with CBC, HDC and the interested parties to work jointly to assess the opportunity this presents.</p>
Michael Simknins	Michael Simkins LLP	Private Landowner	H1	<p>The Housing Chapter of the draft Local Plan sets out the evidence base that has been prepared to underpin the emerging Local Plan, and in particular, the various scenarios and annual housing requirement identified within the Locally Generated Housing Needs Assessment.</p> <p>As set out by the Borough Council within the Draft Chapter, the NPPF places a requirement on the Local Planning Authority to prepare a Plan that meets the objectively assessed housing needs and positively seek opportunities to meet those needs of the area during the Plan Period (Para 14). Coupled with the need to maintain a rolling supply of deliverable sites the equivalent of 5 years (plus 5%), the level of annual housing delivery will be principal element of the soundness of the Local Plan at Examination.</p> <p>We raise concern at this time that while the Council has commissioned the evidence base and set out the various scenarios for housing need and demand, it has chosen within Policy H1 to adopt a level of growth based on an assumed level of housing supply, and not as contained within the NPPF, based on the objectively assessed housing needs. This approach could result in the Local Plan being deemed unsound.</p> <p>A similar approach was recently taken by Suffolk Coastal District Council in preparing its Core Strategy, which was submitted for Examination in early 2012. In 6th June 2012, the appointed Inspector wrote to the Council to clarify precisely what figure the Council considered to be its 'objectively assessed housing needs', as its primary housing policy and resulting annual requirement were inconsistent with the evidence base and Locally Generated Housing Needs Study. As per Crawley Borough, the Council had opted for basing its housing targets on an assumed level of supply as opposed to housing need.</p> <p>The Inspector highlighted that capacity for new housing was a different concept to housing need and that it would be for the Council to demonstrate that a housing provision that falls short of meeting those needs is justified. As per the requirements of the NPPF, the Inspector could not allow the Core Strategy Examination to proceed without at least an acknowledgement of what the Council considered to be the objectively assessed needs.</p> <p>As drafted, Crawley Borough's Local Plan does not clarify what it considers to be the 'objectively assessed housing needs'; but instead provides within Table 1 the variations based on a number of scenarios. This we suggest will need to be refined and the Council place within the next iteration</p>

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				<p>of the Plan a specific requirement. It is noted within the Housing Chapter that the Council considers the Borough to be constrained in respect of its capacity for future growth, while at the same time acknowledging that the need for new housing is significant (Page 79).</p> <p>Based on a continuation of the existing demographic patterns, the Council has identified that this would mean the housing requirement equalling 542 dwellings per annum in the period 2010 to 2031, or 11,382 in total. With 384 dwellings completed in 2010/2011, the residual annual requirement will have risen to 550 dwellings per annum at March 2011 and will continue to rise should the 2011/2012 net completion figures record a level below this figure.</p> <p>By way of comparison, Policy H1 of the draft Local Plan seeks delivery of 3,543 dwellings over a 15 year Plan period, which would equate to 236 dwellings per annum, with an assumed level of windfall to apply beyond that. The figure of 3,543 is that contained within the Council's most recent SHLAA and its supply led approach to the Policy is set out within the 'Reasoned Justification' Section (Page 80).</p> <p>In short, this level of housing delivery would represent only 42% of the identified housing need for the 15 year Plan Period when based on a continuation of current demographic change. This is a significant shortfall in housing supply when compared against the identified demand and need for housing within the Borough. Moreover, with a supply led housing figure, there is no annual requirement of housing need against which the Council will be judged in respect of its 5 year land supply requirement, which is a principal component of the NPPF.</p> <p>While the Council will want to seek a 'supply-led' approach to defining its housing requirement, it will as an Authority need to set out what it considers the objectively assessed housing needs to be for the Plan Period and how it considers it cannot meet those requirements due to physical or environmental constraints.</p>
Michael Simknins	Michael Simkins LLP	Private Landowner	H2	<p>The Council has identified within Policy H2 those sites it considers to be critical to the delivery of the housing strategy over the course of the plan period. The principal site is of course the consented scheme at the North East Sector, Pound Hill, which accounts for 1,900 of the total 3,543 dwellings set out within Policy H1. It is noted however that the Council has also identified additional residual land at the North East Sector for future housing growth, which accounts for a further 100 units.</p> <p>As set out within the accompanying Promotional Document, the land subject to this representation is also included within the current Core Strategy allocation for the North East Sector. While the land was not included previously within the planning application submission, it</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				<p>carries the same policy designation as the land that was and thus could contribute towards the wider objectives of Policy NES 1 and NES 2.</p> <p>It is evident from both Policy H2 and the Diagram included within the Housing Chapter, that the land is currently excluded from the area shown as Key Housing Sites, with the former Core Strategy Allocation being superseded in time by this new Diagram within the Local Plan. As the site could deliver in excess of 75 dwellings, the Diagram and Policy H2 should be amended to include this additional residual area and the capacity added to the overall target within Policy H1.</p>
Michael Simknins	Michael Simkins LLP	Private Landowner		<p>Suitable and Deliverable: The Council acknowledges that it has limited capacity within the Borough's administrative boundary deliver future housing growth and meet the housing needs and demands of its current and future population. Consequently, as set out within the Local Plan Consultation Draft and within this covering letter, suitable and deliverable land is at a premium within the Borough given the current imbalance between the housing levels proposed and the identified housing need and demand.</p> <p>This representation and the available land holding provides the Borough Council an opportunity to deliver an additional circa 100 dwellings within the Borough, and importantly, on land currently included within the Core Strategy allocation for the North East Sector. With the principle of housing and socio-economic growth within this area already established and supported by current Policy, the inclusion of this land as a Key Site is a logical step to aid in meeting the Borough's future housing needs.</p>
Michael Simknins	Michael Simkins LLP	Private Landowner	H4	<p>It is noted that the Council has put forward a number of Options for consideration within the Consultation Draft. A general observation is made in respect of all of the options however, which relates to the terminology used within the Policy wording.</p> <p>As drafted, the opening line of the Policy 'will require' a specific percentage, which is then amended to 'target' later within the Policy. This precise issue was debated at the South Wiltshire Core Strategy Examination, where the Inspector concluded within his Report that:</p> <p>To an extent the policy as drafted provides such flexibility with the statement in its sixth clause that the provision of affordable housing will be negotiated on a site by site basis taking into account the viability of the site. However, this is undercut by the first two clauses of the policy which lay down specific affordable housing requirements. It is the use of the word 'requirement' that causes concern as it carries with it the meaning that the specified levels of affordable housing will be demanded or imposed. Such ambiguity renders the policy ineffective and hence unsound. In order to make the CS sound the word 'requirement' should be replaced with the word 'target' IC/2 (Para 51 to 53, South Wiltshire Core Strategy Inspector's Report, September 2011).</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				<p>We consider that such ambiguity in the current drafting of Policy H4 could also be removed, without prejudicing the Council's objectives to deliver affordable housing within the Borough by replacing the word requirement with the word target within the first sentence.</p>
Charlotte Yarker	Montagu Evans LLP	Rydon Homes, Wates Developments Ltd and Welbeck		<p>SEE FULL REP.... CBC accepts in the Draft Local Plan that it must export some 300 dwellings per annum to neighbouring authorities but does not produce any meaningful evidence as to how this could be achieved through a duty to co-operate. The Draft Local Plan says nothing more than opportunities will be considered on the edge of Crawley. However, CBC is aware of such an opportunity – land west of Ifield – but has not sought to work collaboratively with the Consortium or Horsham District Council to test its deliverability prior to the drafting of the Local Plan.</p> <p>The Draft Local Plan does not contain a policy to compel future collaborative working with neighbouring authorities to accommodate the 300 dwellings per annum shortfall. Policy H1 in effect sets out how less than half the borough's annual housing need will be delivered in the borough, but does not make a single policy provision for how the 300 dwellings per annum shortfall could be met outside its boundaries.</p> <p>The Draft Local Plan therefore fails to meet any of the four tests of soundness set out in paragraph 182 of the NPPF:</p> <ul style="list-style-type: none"> <li>• It has not been prepared based on a strategy which seeks to meet objectively based development requirements and therefore is not positively prepared.</li> <li>• It does not represent the most appropriate strategy and therefore is not justified.</li> <li>• It is not based on effective joint working on housing delivery, a fundamental cross-boundary strategic priority and therefore is not effective.</li> <li>• It does not plan for issues with cross-boundary impacts and is not reflective of joint working on a fundamental area of joint interest and therefore it is not consistent with national policy.</li> </ul> <p>There remains a significant opportunity for CBC to address how its full housing need could be met across its boundaries given that the least constrained authority proximate to Crawley, Horsham District Council, is yet to publish its preferred options for its local plan. This provides an opportunity for CBC to enter into a meaningful joint-working arrangement with Horsham prior to the submission of both plans to the Secretary of State. It is the view of the Consortium that the failure of either Horsham District Council or CBC to take this opportunity to co-operate will result in both plans being found unsound.</p>
John Lister	Natural England			<p>In earlier consultation you told us that the town's open spaces should be protected even though this will limit the number of houses that can be built in the future. Do you still?</p> <p>Natural England support the protection and enhancement</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				of green spaces. Green spaces offer many potential benefits not only to people and their health but also to biodiversity and to the natural environment.
John Lister	Natural England			<p>The draft Local Plan identifies that around 240 houses should be built each year from 2015 onwards despite the fact that over 500 houses will be needed per year. Do you agree or disagree with the 240 figure being set?</p> <p>It is not within Natural England's remit to comment on the housing allocation figure but an under provision of housing may lead to development by appeal with therefore an increased risk of proposals that do not meet the Borough's wider objectives.</p>
John Lister	Natural England			<p>To help towards meeting some of the future demands, housing should be developed in the town centre?</p> <p>Natural England agree that housing should be developed in suitable locations close to where there are already sufficient services, infrastructure and amenities to support them subject to the avoidance of damage to recognised environmental assets and the ecosystem services they provide.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Pound Hill - North East Sector (1900 dwellings)</li> </ul> <p>Natural England wish to resist the allocation of this large housing site as it could have a potentially significant impact on an area of ancient woodland, this would be contrary to policy ENV12: Biodiversity, which aims to ensure there is a net gain in biodiversity and to protect areas of ancient woodland.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Northgate - Town Centre North (100 dwellings)</li> </ul> <p>Natural England is concerned with the allocation at Northgate as the development could have a negative impact on the natural environment and in particular an area of ancient woodland.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Ifield - Community College (125 dwellings)</li> </ul> <p>This is a site identified as brownfield surplus educational land; it is located within the settlement in an area of predominantly residential use. Natural England note that although brownfield sites are often identified for redevelopment it is not always appropriate on sites of high environmental value. Further environmental assessment would be encouraged prior to any development on the site.</p>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Tilgate - Thomas Bennett (96 dwellings)</li> <li>• Northgate - Telford Place (75 dwellings)</li> <li>• West Green - Southern Counties (75 dwellings)</li> </ul> <p>These three sites are each identified as previously developed sites, located within the main built up area of the settlement within predominantly residential areas. Natural England note that whilst brownfield land is often identified for redevelopment, it is not always appropriate on sites of</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				high environmental value. Further environmental assessment would be encouraged prior to any development of these sites.
John Lister	Natural England			<ul style="list-style-type: none"> <li>• West Green - Fairfield House (93 dwellings) Currently a vacant site having previously being used for nurse's accommodation (now demolished). Natural England note that although brownfield sites are often identified for development it is not always appropriate on sites of high environmental value. Further environmental assessment would be encouraged prior to any development of this site.</li> </ul>
John Lister	Natural England			<ul style="list-style-type: none"> <li>• Bewbush - Breezehurst Drive (96 dwellings) This site is currently used as a car park, open space/leisure facilities and neighbourhood centre. Natural England urge that the open space be incorporated within any redevelopment scheme and at an equivalent or higher value.</li> </ul>
John Lister	Natural England			<p>Every development that includes housing should include some "affordable housing", which is lower cost (whether available to rent or buy). The proportion of affordable housing will vary according to the scale of the development.</p> <p>It is not within the remit of Natural England to comment on the figure of required affordable housing.</p>
Neil McDonald				<p>OBJECTION - First, despite your authority determining the Ifield Road site as a key housing site, I have been completely ignored. No one has consulted me on the local authority's plan, no one has discussed with me the economic viability of deciding the site is a key housing site, and this despite my raising concerns with the local authority in August this year. You advised in your e mail of 29 August 2012 that the Council would be looking to see in terms of layout and design some form of landmark building on the site and "at a density which is lower than that permitted by the outline permission". I was astonished by this and replied to you setting out my concerns on 14 September 2012. I did not receive a reasoned reply.</p>
Neil McDonald				<p>OBJECTION - Second -and I now intend to seek legal advice on this-having spent a shedload of money obtaining the current outline consent, having had to deal with and shoulder the delays and costs caused by objector Wilson and the local authority itself not correctly applying its own procedures, to be advised without an iota of consultation that you intend to effectively negate the consent [seeking to lower the density] how can I rely on anything from the local authority as to decisions and decision making ?There is clearly no understanding on the local authority's part of the commercial effects of such a decision; I object too to being treated as if I don't matter. Have the other eight key</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				housing sites in the borough been treated with the same cavalier, steamroller attitude?

## Category 6: Environment

Name	Organisation	On Behalf of:	Policy:	Environment Comments
Tricia Butcher	The British Horse Society		ENV11	Policy ENV11: Green Infrastructure This policy is welcomed and supported, especially "ii identify opportunities for enhancement"
Tricia Butcher	The British Horse Society		ENV13	Policy ENV13: Open Space, Sport and Recreation This policy is supported, although in the "Reasoned Justification" typologies list I would have liked to see the last point read "** Green corridors (e.g. public rights of way)"
Tricia Butcher	The British Horse Society			The two notable omissions I would draw attention to are the word "multi-use" in relation to public rights of way, and acknowledgment of/support for the West Sussex Rights of Way Improvement Plan (part of the WS Local Transport Plan).
Katherine Harrison	Surrey County Council		ENV1	<p>The Local Plan refers to a Carbon Neutral Commitment on page 27 which states that, "The Crawley Carbon and Waste Reduction Strategy aims to make Crawley carbon neutral and zero waste by 2050...". Support for carbon neutral commitment is strongly supported and recurs through the vision, objectives and policies, however, the zero waste commitment is not again mentioned. Crawley Borough Council's pledge to reducing waste in Crawley should therefore be strengthened by amending Objective 16 on page 30 to read: "Objective 16: To work towards ensuring Crawley is a carbon neutral and zero waste town by 2050." To follow this through, Policy STRAT4 and Policy ENV 1 should be revised by the addition of the words "and zero waste" immediately following the words "carbon neutral" in line 2 of Policy STRAT4 on page 34 and in line 2/3 of Policy ENV 1 on page 96. For completeness and to improve consistency, the words "and zero waste" should also be inserted after the other references to "carbon neutral" throughout the Local Plan.</p> <p>These amendments would helpfully provide further impetus to minimise waste arisings and reduce residual waste exports to surrounding areas which have the potential to increase in the medium term. This is important as the draft West Sussex Waste Local Plan (June 2012) accepts that existing landfill capacity within West Sussex will run down over the first part of the plan period and no provision is made for future landfill sites through criteria based policies or allocations other than a small extension to an existing landfill.</p>
Katherine Harrison	Surrey County Council		ENV1	The promotion of a high standard of sustainable construction, through Objective 17 on page 30, and through the promotion of the Code for Sustainable Homes and BREEAM in Policy ENV 1 on page 96, is supported as this will ensure compliance with the Site Waste Management Plan Regulations 2008 through supporting the re-use and recycling of construction, demolition and excavation waste (CDEW) and the

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				diversion of CDEW from landfill in the locality and surrounding areas. This will also help deliver sustainable development by driving waste management up the waste hierarchy in accordance with PPS10.
Ian Miller	Tinsley Lane Residents Association		ENV13	<p>Tinsley Lane is a discrete residential area bounded on two sides by the Manor Royal Business District and separated from Pound Hill and the rest of Three Bridges by the railway line and Crawley Avenue motorway link road. Within these defined boundaries, and with a mix of housing styles, many dating from before the New Town, it has developed a village like community with a strong local identity which should be protected and enhanced within the Local Development Framework. The unique semi-rural characteristics of Tinsley Lane should thus be protected by designating it to be an Area of Special Environmental Quality.</p> <p>Shielded from the railway line by Summersvere Wood (protected Ancient Woodland and home to a range of wild-life) this area could be utilised as a valuable recreational facility by the addition of nature trails etc. There are also three sports fields (two leased by Oakwood football Club) owned by the Homes and Communities Agency, which have been identified as having development potential.</p> <p>Oakwood F.C. has several boys and girls football teams covering all age groups and provides an extremely valuable service in developing our young people but it needs more funding to bring its facilities up to modern standards. This was discussed with the previous owner, English Partnerships, and a draft development plan was proposed in 2003 to build houses on the north sports field while maintaining the southern half for recreation. This plan was however not considered to be viable at the time.</p> <p>Ideally these sports fields could be retained for recreation with enhanced facilities at Oakwood F.C. to include an open play area for children of residents. If this is not possible then a sustainable low density development project could be economically viable if a commuted payment from the development could be allocated to redevelop the Oakwood F. C. facilities in recognition of the contribution they make to the youth of the Borough. A low density would be necessary to avoid overloading the drainage and sewerage systems which are already close to capacity and the only practical traffic access would not be able to cope with any increase in usage without considerable adverse effect on existing properties.</p> <p>As the LDF has identified a shortage of skilled labour and of family homes this small site could be allocated for low level aspirational housing which respects the character of the surrounding area and minimises the impact on the adjacent bungalows.</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				The proximity of the Manor Royal Business District makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the site ideal for family housing. With new recreational facilities centred on Oakwood football Club, Tinsley Lane could become a distinct individual area of Special Environmental Quality of which Crawley could be proud.
	Crawley Young Persons Council			Open spaces? · More open spaces for youths to just sit and relax with friends
	Crawley Young Persons Council			Environmental issues? · Encourage public transport/ cycling · More cycle paths are needed as members thought there are not enough which makes cycling unsafe · More emphasis on environmental care · More paths at road level · However it was noted that there must be a balance between promotion of second runway at Gatwick as well as Environmental care to avoid hypocrisy
Chris Owen	West Sussex County Council			Issues and Options Consultation – What you told us Reference to ‘Sites of Nature Conservation Interest’ in third paragraph should be amended to read ‘Sites of Nature Conservation Importance’.
Chris Owen	West Sussex County Council		ENV10	Does not clearly define where Air Quality Assessments will be required which will lead to uncertainty for developers over whether or not an assessment is required. It is suggested that suitable criteria are added to the policy to determine when Air Quality Assessments will be required.
Chris Owen	West Sussex County Council			Biodiversity: The draft text states ‘The County Council has produced a register of Site of Local Conservation Importance ....’ These sites are SNCIs. For clarity, the following wording is suggested: ‘The County Council, in partnership with Crawley Borough Council, has produced a register of Sites of Nature Conservation Importance (SNCIs), sometimes also referred to as Local Wildlife Sites’.
Chris Owen	West Sussex County Council		ENV12	This policy states in its third paragraph: ‘The borough council will seek improvements in nature conservation value of an area in association with new development and will encourage the management and interpretation of these areas.’ This is strongly supported although an alternative form of words is suggested: ‘Developments should seek to achieve a net gain in biodiversity. The borough council will encourage the management and interpretation of biodiversity within development sites.’ This policy states in its final paragraph: ‘Opportunities to deliver a net gain in biodiversity will be taken through appropriate mitigation, enhancement, “building in”

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>biodiversity and use of planning obligations.' Strictly speaking mitigation relates to minimising adverse impacts, for example adjusting the timing of works to avoid potential impacts such as removing trees and shrubs outside the bird breeding season. Thus mitigation in itself is unlikely to deliver a biodiversity enhancement. However, the term is often applied rather loosely. 'Net gain' requires seeking opportunities for biodiversity enhancement i.e. over and above any mitigation and compensation requirements (compensation being replacement of features and habitats lost or negatively impacted as a result of the development).</p>
Andy Evans	Miller Homes			<p>The Local Plan map identifies the land at Tilgate, North of the M23 as Ancient Woodland. Whilst we acknowledge the presence of Ancient Woodland in this location, to our knowledge, the area is far less extensive than shown on the proposals map. The extent of the notation should be drawn consistent with the area currently defined as such.</p> <p>Land East of Brighton Road appears to be shown as Structural Landscaping on the Proposals Map. In other chapters it seems to be shown as Natural/Semi Natural Green Space though the similarity of shading for some notations makes this difficult to determine. However, the Proposals Map should show notations to which policies relate and should not be contradicted by other chapters of the Local Plan. It is not clear what policy applies to either Natural / Semi-natural Green space or Structural Landscaping. If there is none then the notation should be deleted. If a policy does apply then this should be made clear by noting the relevant policy next to the key of the Proposals Map. In any event, the land so identified includes land around Old Stone Cottage which is partially previously developed land, is clearly distinct from surrounding woodland and has no role as Green Space or Structural Landscaping and should be deleted from such notation irrespective.</p>
Martyn Chase	Stanhope plc			<p>The provisions in respect of the Environment are broad ranging, and are broadly supported. We would like to see additional consultation prior to the unilateral implementation of CIL in respect of the infrastructure works.</p>
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	ENV11	<p><b>OBJECTION - Oaksworth</b></p> <p>The map on the first page of the Environment Chapter appears to indicate a natural and semi natural space designation over garden land primarily laid to lawn (see Appendix 2). The area has been surveyed by planners, does not meet the definition of natural and semi-natural open space and must be deleted from the Environment Map. Land to the south of this area in the ownership of my client is correctly classified as natural and semi natural open space.</p> <p>As part of any development proposals to intensify the use of the Oaksworth site, my client has offered to allow access to the natural and semi natural open space to</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				increase access to the countryside and the surrounding green infrastructure as strongly supported in consultation responses. Support was expressed for the provision of new areas of green infrastructure and, subject to a satisfactory outcome in relation to intensification of the use of the site of Oaksworth, the natural and semi natural site to the south of the proposed built up area could be allocated as an additional area of public open space in the Local Plan.
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson		OBJECTION - Oaksworth along with other developed areas is shown as a Green Corridor on the Green Infrastructure Assets and Opportunities Map. It is unclear how the area has been defined. Certainly, the area contains built development and for this reason, there should therefore be no policy in the Local Plan that seeks a 'blanket' refusal of future proposals.
Bill Temple-Pediani	KTI Energy Limited			You must co-operate with Horsham District Council on any infrastructure relating to decentralised generation and distribution of electricity and heat.
Jack Straw	Mole Valley District Council			<p>8. We acknowledge policy STRAT3: Meeting Housing needs across the Housing Market Area, but although the preceding text talks about cross-boundary working to understand the nature of the wider housing market area, this is not reflected in the policy which appears to relate only to development within the Borough's boundaries.</p> <p>9. It is recognised that Crawley is in a constrained position and the need to prevent town cramming and the loss of open space within the Borough is supported. However, Mole Valley is also in a highly constrained position with significant areas of AONB, Green Belt, Special Areas of Conservation and limited land supply. The concern is that if the needs of Crawley are not being met within or near to the town, this will have a knock-on effect particularly to Boroughs such as Reigate &amp; Banstead with which Mole Valley has far greater levels of movement both in terms of flows of household and travel to work patterns.</p>
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	ENV11	<p>OBJECTION - Land off Saxon Road</p> <p>The map on the first page of the Environment Chapter appears to indicate an amenity open space designation over land off Saxon Road. Assessing needs and opportunities: a companion guide to PPG17 remains part of Government guidance. It defines the primary purpose of the amenity open space typology as Opportunities for informal activities close to home or work or enhancement of the appearance of a residential or other area. As the site is not publicly accessible, it does not provide opportunities for informal activities. The site is well screened to the north, south and east by hedged and treed boundaries and to the west by development. It therefore has a very limited role in terms of visual amenity. Rather, the boundaries are important to local visual amenity and the character of the area, but for the</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>reasons set out above, the whole site cannot be described as an amenity open space.</p> <p>The area has been surveyed by planners, does not meet the definition of amenity open space and amenity open space must be deleted from the Environment Map.</p> <p>As part of any development proposals to intensify the use of land off Saxon Road, my client has offered to allow access to part of the site to increase access to the countryside and the surrounding green infrastructure (as strongly supported in consultation responses where support was also expressed for the provision of new areas of green infrastructure.</p>
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams		<p>Green Infrastructure Assets and Opportunities Evidence Base Map</p> <p>Land off Saxon Road along with other developed areas is shown as a Green Corridor on the Green Infrastructure Assets and Opportunities Map. It is unclear how the area has been defined. Certainly, the area contains built development and for this reason, there should therefore be no policy in the Local Plan that seeks a 'blanket' refusal of future proposals.</p>
John Cooban				<p>The new local plan needs to include a comprehensive Tree Strategy – preferably a complete section in its own right, or at least its own section in Environment or maybe even Infrastructure, on the basis that Green Infrastructure should be considered at least as the same level as any other element of infrastructure, and that trees are the most important element in green infrastructure.</p> <p>The starting point for tree strategy might be the Trees in the Townscape document produced by TDAG, and Trees in Towns II.</p> <p>It needs to deal with all urban tree cover as a continuum, certainly looking beyond 2029. Presently, CBC is not coordinated at present re trees. It is about all tree cover, regardless of ownership. It is crazy that Planning and Amenity services have separate tree databases.</p> <p>You won't get a proper tree strategy though, unless you get tree key personnel at high level and change culture.</p> <p>We are really lucky with our new town tree cover, and rather take it for granted. We really need to look after it better into the future for all sorts of reasons.</p> <p>The strategy needs to identify and iron out the main areas of discontinuity that exist at the moment. E.g. using development control as a systematic arboricultural process for protecting, maintaining, enhancing, renewing and monitoring urban tree cover as land passes through your scope. Getting the right scheme content to start with, rigorously applying BS 5837, making sure you can enforce the tree / landscape related Conditions, and making sure that essential tree planting is thriving before the end of your 5 year control time-out. Etc.</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>I started looking at your individual tree related policies, like CH3 f) would be better to refer to numbers of new replacement trees of a specified size (e.g. 16-18cm girth) being related to the size of trees being removed e.g. 1 new tree per 100mm stem diameter of tree being removed.</p> <p>But these are details. Get a strategy first.</p>
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	ENV1 & ENV6	<p>SEE FULL REP - "On the matter of sustainability..." "...it is noted that that the Local Plan seeks to impose policy burdens on development which go beyond national standards..."</p> <p>"The NPPF states in paragraph 95, bullet 3 that:- When setting any local requirement for building sustainability, do so in a way consistent with the governments zero carbon buildings policy and adopt national standards."</p> <p>"...setting standards that go beyond Building Regulations is also contrary to the findings of the majority of the members of the standards working group that produced the report "A review of Local Standards for the Delivery of New Homes..."</p>
Sally Stallan	Horsham District Council			<p>Further to our discussions regarding the potential for renewable and decentralised energy in the area, we welcome the positive stance taken towards combating climate change and look forward to continuing to work closely with CBC in developing options for a decentralised energy network. Given the predicted rise in temperatures over the forthcoming years, particularly in the South East, HDC agree with the proposed approach to climate change adaptation and are hoping to adopt a similar approach in the HDPF. Again related to climate change, HDC acknowledge the outcomes of the Gatwick Diamond Water Cycle Study and the identified pressures relating to water stress in the south east. Given that changing climate conditions are likely to aggravate water conditions further, HDC welcome the pro-active approach taken to water conservation and again look to adopt a similar approach in our strategy.</p>
Tim Hoskinson	Savills	Wilky Group		<p>The policies in the environment chapter of the plan identify three priority areas where new development is expected to exceed national standards (low carbon energy, radiant energy, and water efficiency). Land to the east of Gatwick Airport is identified as a Priority Area for District Energy Networks, as shown on the accompanying plan. Policy ENV1 states that new development in this area will be expected to seek to make use of available heat from existing or proposed district heating and/or cooling networks and/or waste heat sources.</p> <p>The Wilky Group is concerned to ensure that Gatwick Green will be an exemplar sustainable development, anticipating future requirements in transport construction technologies, energy and waste management and</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>biodiversity whilst being aligned closely with the employment, education and health needs of surrounding communities.</p> <p>To this end, particular attention has been given to potential sustainable approaches and a sustainability strategy for Gatwick Green, as set out in the evidence base previously submitted. The proposals will embrace a range of measures to minimise energy demand in both construction and operation, including the opportunity for a biomass-fuelled combined heat and power system to serve the development, with potential to serve Gatwick Airport also.</p> <p>By taking a considered approach to sustainable development from the outset, Gatwick Green can deliver a development that will be regarded as exemplary in its approach to:</p> <ul style="list-style-type: none"> <li>- sustainable construction and landscape</li> <li>- the management of energy, waste and water</li> <li>- green infrastructure and biodiversity</li> <li>- transport integration</li> <li>- community health, education and well-being</li> <li>- anticipating future economic, social and environmental conditions</li> <li>- responding to a unique set of opportunities to create a world-class location for international business.</li> </ul>
Elizabeth Burt	Savills	Crest Strategic Projects	Environment map, page 90	<p>This map identifies that the Kilnwood Vale site is covered by a landscape character edge designation. There does not however appear to be any identification or definition of what this is. The site is an allocated site for a new neighbourhood and has consent for approximately 2,500 dwellings. It is therefore unclear why this designation has been placed on the site and CSP requests its removal.</p> <p>The land known as land between west of Bewbush and Faygate is not identified to be covered by any environmental constraints or designation. It can be seen however that large areas surrounding and within the Borough which are currently undeveloped are subject to such designations. This demonstrates that the land between west of Bewbush and Faygate presents a suitable and less environmentally constrained option for the delivery of housing and should therefore be considered by CBC as a potential option for the delivery of housing. Its development would also form a logical extension to the Kilnwood Vale site. CSP has submitted a detailed site assessment to HDC to demonstrate the suitability of the site for development and it is strongly recommended that CBC liaises with HDC to discuss the merits of the site and opportunity to deliver some of Crawley's housing need here.</p>
Rob Matthews	Gatwick Airport Ltd.		ENV8	GAL supports the general thrust of this policy to prevent unacceptable risks and / or harm from environmental pollution and / or land contamination.

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>GAL questions, however, whether this policy should relate to the potential pollution impacts of development other than noise and air quality given that the subsequent proposed policies – Policies ENV9 and ENV10 - separately cover noise and air quality.</p> <p>As drafted it would appear that the draft policy does encompass the broad range of environmental pollution issues including noise and air quality. If so it duplicates elements of Policies ENV9 and ENV10.</p> <p>In any event GAL suggests that the word 'material' in sub clause (b) should be changed to 'unacceptable' to properly reflect the advice in bullet 4 of paragraph 109 of the NPPF. Suggested Changes to Policy ENV8</p> <p>The duplication with Policies ENV9 and ENV10 could be overcome by explaining in the reasoned justification that the impacts of development on air quality and noise are separately covered by Policies ENV9 and ENV10.</p>
Rob Matthews	Gatwick Airport Ltd.		ENV9	<p>GAL supports the inclusion of Policy ENV9.</p> <p>GAL has in the past objected to new noise sensitive development such as housing, when it has been proposed in locations that it considers could be exposed to unacceptable levels of existing or future aircraft noise. GAL's representations in those cases have been based on the advice that was contained in the now revoked Planning Policy Guidance Note 24 (PPG24).</p> <p>At the same time GAL accepts, as proposed in Policy ENV9, the imperative of mitigating so far as possible the noise from proposed noise generating development.</p> <p>The specific advice in the NPPF on planning policies for noise is at paragraph 123 of the NPPF.</p> <p>This states the aim to "avoid noise from giving rise to significant adverse impacts on health and quality of life". GAL considers it would be appropriate to reflect this national policy aim within the policy to provide appropriate context to the expected level of mitigation.</p> <p>Given the policy vacuum left by the revocation of PPG24 GAL also supports the need for technical advice to support the interpretation of policy and to ultimately inform planning decisions. In this regard it is relevant to note that the Coalition Government is currently preparing a new Aviation Policy Framework and within that framework is expected to come to a view on appropriate noise thresholds.</p> <p>GAL would expect the Government's conclusions to be reflected in the locally prepared guidance.</p> <p>The Government is expecting to publish its Aviation</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				Policy Framework in Spring 2013 which will allow its conclusions to be taken into account in the preparation of the Noise Guidance Document referred to in the draft policy. GAL would be pleased to support the preparation of the Guidance... SEE FULL REP
Rob Matthews	Gatwick Airport Ltd.		ENV10	<p>GAL supports the inclusion of Policy ENV10.</p> <p>Whilst generally supporting the intention behind the policy GAL is concerned that the absolute requirement in first paragraph of the policy for any development (supported by an Air Quality assessment) to not worsen air quality is unduly prohibitive.</p> <p>Clearly there will be cases where this imperative will be important, for example development in or impacting on Air Quality Management Areas where existing levels of emissions already exceed or come close to Air Quality Standards, or where the development would in itself or cumulatively with other development be likely to lead to such a breach.</p> <p>However, it should also be noted that even small scale developments such as commercial or residential developments, such as affordable housing built to Code for Sustainable Homes Level 6, would also have some adverse impact on air quality arising from, for example, traffic generation.</p> <p>For these reasons it is considered that the impact test should be reworded so as not to cause a 'material worsening' in air quality.</p> <p>The supporting text can explain the importance of ensure no worsening of air quality in AQMAs and where possible that development should lead to improvements in air quality.</p> <p>GAL would suggest that paragraph 1 of the policy be amended so as to read as follows... SEE FULL REP</p>
Alyson Jones	Barton Willmore	SEGRO	ENV1	<p>In general the policy requirements and supporting text are unnecessarily complicated and difficult to understand. Such detail should not be set out in the Local Plan document.</p> <p>It is considered that there is no justification provided as to why national minimum standards for overall carbon performance should be required. The identification of low carbon energy as a priority by the Council is not considered a reasoned justification. SEGRO considers that the approach should only reflect that required by national planning policy and Building Regulations. SEGRO is of the view that it is not the place of the planning system to seek to impose more stringent requirements where other national legislation already covers it, and that LPAs should not seek to go beyond what is nationally required. Whilst some developers may</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>choose to exceed minimums it should not be enforced upon them through planning policy. SEGRO therefore strongly disagrees with the policy wording set out in ENV1. In SEGRO's view there is no sound basis for this.</p> <p>Bullet ii indicates that where it is not viable to achieve the required rating, it should be demonstrated that the equivalent overall carbon performance will be achieved, however it is not clear as to what is meant by this or how it is to be demonstrated. Further to which, if such requirements are likely to make developments unviable, it is unlikely that developments will be able to make an equivalent payment toward the Crawley Offset/Buyout Fund in lieu, resulting in development stalling indefinitely.</p> <p>In terms of energy assessments, clarity should be provided as to the requirements for an outline scheme where it might not be possible to provide the level of detailed analysis, as would be available for a detailed scheme.</p> <p>CBC should consider the costs of requiring developers to undertake and produce such a protracted set of outputs in support of an application and the Council should also undertake viability testing as part of the viability appraisal of the Local Plan in accordance with paragraph 173 of the NPPF.</p>
Jennifer Wilson	Environment Agency			<p>There is no mention of the Water Framework Directive within the Crawley Local Plan or how the LPA will make its contribution towards achieving its objectives with respect to the water bodies within or flowing through Crawley.</p> <p>The local plan (LP) includes a number of policies that will ultimately assist in progression of work under the Water Framework Directive (WFD). However, it is disappointing that WFD is not specifically referenced. Local Authorities have a general responsibility not to compromise the achievement of UK compliance with EC Directives. Failure to comply with WFD requirements may lead to the EC bringing legal proceedings against the UK. ....SEE FULL REP</p>
Jennifer Wilson	Environment Agency		ENV1	<p>We would suggest that the section relating to the paragraphs relating to this policy and the policy itself acknowledges the large savings from retrofitting existing stock. Savings can be derived from retro-fitting of existing homes and buildings through improved energy and water efficiency. Water demand management measures are simple and cheap. Measures to reduce hot water use will also reduce energy bills in existing dwellings.</p> <p>The evidence base for this change is referenced here:  1. The BERR Energy White Paper "Updated Energy and Carbon Emissions Projections", (Section 5) found at: <a href="http://www.berr.gov.uk/files/file39580.pdf">http://www.berr.gov.uk/files/file39580.pdf</a> shows that</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>domestic energy use accounts for approximately 27% of UK energy demand. Domestic energy efficiency has a big part to play in local contributions to emission reduction targets</p> <p>2. The Environment Agency and Energy Savings Trust have published "Quantifying the energy and carbon effects of water saving" It can be found here on our external website: <a href="http://www.environment-agency.gov.uk/business/topics/water/109835.aspx">http://www.environment-agency.gov.uk/business/topics/water/109835.aspx</a></p> <p>This report shows where the carbon emissions come from relating to water and hot water use (in the home and by the water company). This report states that water in the home is responsible for 89% of water related carbon emissions.</p>
Jennifer Wilson	Environment Agency		ENV4	We support this policy ENV 4.
Jennifer Wilson	Environment Agency		ENV6	<p>SEE FULL REP... We support this policy however we believe that in the current wording there is an oversight that we believe should be addressed.</p> <p>Bullet point (ii) states: "all major development (10 or more dwellings, or non-domestic developments of 1000sqm or more) etc...."</p> <p>If there were proposals for lots of smaller (less than 10 dwellings) developments, the cumulative effect on water resources could be equal or more than for a major project that was required to comply with your current policy. A similar argument could be made for non-domestic developments of less than 1000 sqm.</p> <p>To achieve level 3/4 for water use only will cost around an additional £189 per property (over and above baseline cost for standard appliances). To achieve level 5/6 for water use only will cost an additional £3,229 above baseline cost because a greywater or rainwater harvesting system would be required. (WRc Report UC7231 for the Environment Agency Sept 2006)....</p>
Jennifer Wilson	Environment Agency		ENV8	We support this policy, although we believe reference to its contribution towards the objectives of the WFD should also be included within the pre and post policy text. This would provide additional justification for this policy, in reducing the risk to ground and surface waters.
Jennifer Wilson	Environment Agency		ENV11	<p>The policy on Green Infrastructure (GI) is a bit vague, and does not provide a time table for delivery of a plan or any actual delivery on the ground. The policy needs to give developers a clear steer, of what is expected from them. The purpose of the policy should be to Create, Protect, Enhance and Extend GI within Crawley for the benefit of communities and wildlife alike.</p> <p>River corridors are great contributors to GI, but this has</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>not been mentioned in the policy, any pre amble or justification text.</p> <p>We believe the policy should be amended to;</p> <ul style="list-style-type: none"> <li>• provide a clearer picture of how the authority proposes to contribute to the England Biodiversity Strategy and the other aspects of this;</li> <li>• identify and implement a green infrastructure network through not just the safeguarding, enhancing and extending existing areas of GI or green open space but also create, through a generous provision of GI, green space and water bodies in new development proposals;</li> <li>• ensure that linkages between existing and new GI areas are created and protected; and</li> <li>• ensure the integrity of the network of green infrastructure is protected and enhanced through the lifetime of the LP.</li> </ul>
Jennifer Wilson	Environment Agency		ENV12	<p>...SEE FULL REP We would suggest the following minor changes to this policy for clarity (in bold): To ensure a net gain in biodiversity...</p>
Jennifer Wilson	Environment Agency			<p><b>Protected Species</b></p> <p>There needs to be a clear policy on protected species of wildlife, so that developers are aware that the presence of protected species is a material consideration in the planning process. Ecological surveys must be conducted prior to seeking planning permission and should not be dealt with by way of conditions.</p> <p>In the case of European protected species present on land proposed for development, recent case-law dictates that a mitigation strategy must also be submitted to the local planning authority (LPA), prior to seeking planning permission.</p> <p>If a mitigation licence from Natural England is likely to be needed i.e. an offence is likely to occur if development proceeds, then the LPA must be satisfied that the three tests imposed by the Habitats Regulations (2010) are met. They are:</p> <ol style="list-style-type: none"> <li>1. The proposed development must meet a purpose of preserving public health or safety or other imperative reasons of overriding public interest, including those of a social or economic nature or of primary importance for the environment</li> <li>2. that there is no satisfactory alternative</li> <li>3. that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.</li> </ol> <p>This not only applies to full planning permission but also for outline permission, for listed buildings consent and for building regulations consent. If the developer can show how the need for licences will be avoided, then the tests do not need to be applied by the LPA</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				The LPA can no longer add a planning condition stating that a licence is sought from Natural England and need to screen applications to determine their likelihood of impacting on European Protected Species & pay careful attention to mitigation measures proposed by the developer. Mitigation proposals need to be submitted to the LPA so they can either apply the three tests or show how the need for licences will be avoided.
John Lister	Natural England			New development should be designed and built in a way to reduce energy use and encourage the use of cleaner energy.  In seeking to reduce greenhouse gas emissions Natural England agree with adopting design and construction methods to reduce energy use and encourage the use of low carbon energy.
John Lister	Natural England			Development should be managed in such a way that it does not put Crawley's wildlife or natural environment at risk.  Natural England wish to encourage development to respect wildlife, natural environment and the ecosystem services that are provided and encourage a wider landscape view of such assets to be taken in the context of the anticipated consequences of climate change.
John Lister	Natural England		ENV1	Natural England support the emphasis given to the increased supply and use of renewable and/or low carbon energy in principle, although would like to draw attention to the guidance as set out within the NPPF which sets out the likely impacts of potential wind energy development when identifying suitable areas, and in determining planning applications for such developments: <a href="http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/consents-planning/nps2011/1938-overarching-nps-for-energy-en1.pdf">http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/consents-planning/nps2011/1938-overarching-nps-for-energy-en1.pdf</a> Natural England welcome the three-step energy hierarchy introduced by the Borough to ensure all development minimises carbon dioxide emissions.
John Lister	Natural England		ENV2	Natural England support the encouragement of developments to use renewable and low carbon energy. Though it is important that costs to the natural environment are avoided or minimised where possible This issue is covered within part iv of policy ENV2; 'the applicant will need to demonstrate that the proposed location is a suitable area for the type of energy development proposed as per recognised good practice criteria'.
John Lister	Natural England		ENV5	Natural England notes and support the adaptation measures identified within policy ENV5, in particular making use of the natural environment i.e. tree planting to help moderate the heat island effects.

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Environment Comments
John Lister	Natural England		ENV11	This policy aims to protect, enhance and support the green infrastructure within the Borough. Natural England welcome this aim and suggest reference to the following good practice guidance in reference to Green Infrastructure and biodiversity: <a href="http://www.tcpa.org.uk/data/files/TCPA_TWT_GI-Biodiversity-Guide.pdf">http://www.tcpa.org.uk/data/files/TCPA_TWT_GI-Biodiversity-Guide.pdf</a>
John Lister	Natural England		ENV12 & ENV13	As it is Natural England's statutory purpose to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, Natural England support policy ENV12 and in particular the statement to ensure there is a net gain in biodiversity and to protect areas of ancient woodland. Natural England recognise the importance of open space, sport and recreation in delivering a sustainable community, and therefore support policy ENV13 which restricts development that remove or affect the continued use of existing open space, sport and recreational spaces.

## Category 7: Infrastructure

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
Katherine Harrison	Surrey County Council			<p>Transport Development Planning</p> <p>The approach to airport parking appears to be reasonable and we look forward to being consulted on any major future proposals for such development. We would also anticipate Crawley Borough Council consulting us on any significant changes to the approved development scheme for 1900 homes in Crawley North East Sector. We further expect to be consulted at an early stage on the proposals for Town Centre North. Early consultation in the event of such proposals coming forward is important because of the potential transport impacts on Surrey and the local road network.</p>
Chris Owen	West Sussex County Council		Map:	It is suggested that the Household Waste Recycling Site & Transfer Station off Metcalf Way (Grid Ref – Easting 526715, Northing 138590) be included.
Chris Owen	West Sussex County Council		IN1	<p>The County Council would wish to see financial contributions secured from appropriately-located future developments and/or through the Community Infrastructure Levy so that accumulated funds will be available in the future to construct a CWRR.</p> <p>The reasoned justification for Policy IN1 makes reference to waste management and disposal which is welcomed. It is suggested that a reference to infrastructure for the storage, handling and processing of minerals including recycled and secondary aggregates should also be made in the justification, particularly as there is a significant aggregates railhead in Crawley. Policy IN1 itself focuses on contribution to the neighbourhood or town, however minerals and waste infrastructure often has a “larger than local” significance (which is the case for the railhead at Crawley, which serves the area beyond Crawley). We suggest that the policy is broadened to include “larger than local” infrastructure within its scope, perhaps through the following amendment: “Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, or have a larger than local significance, unless an equivalent replacement or improvement to services is provided”. The justification of the policy should also make reference to why larger than local is included within the policy.</p>
Chris Owen	West Sussex County Council		IN3	<p>It is suggested that the third sentence of the policy be more positively worded than the draft version. The following alternative wording is suggested: “Development will be permitted unless the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.”</p> <p>The County Council supports the study work commissioned earlier this year by the Borough Council to assess the transport implications of alternative Local Plan development strategies. The findings of the Stage 1 study, published as part of the Preferred Strategy consultation, have provided a strategic indication of the degree of stress</p>

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
				that development could impose on the wider highway network in the 2029 AM peak hour. The results of Stage 2, expected in early 2013, will give more details of local impacts for specific development allocations and help to establish the transport infrastructure improvements needed if the consequences of new development are to be satisfactorily mitigated.
Chris Owen	West Sussex County Council		IN4	There is no obvious reference to standards for cycle parking which should be included in the Plan to ensure adequate supply of cycle parking in new developments, with the aim of meeting the needs of inhabitants and encouraging the use of sustainable modes of transport. It is suggested that a reference to cycle parking provision is added to the policy.
Chris Owen	West Sussex County Council		IN6	Three Bridges Station already operates as an informal parkway station due to the number of services it provides to a wide range of destinations which leads to railheading; i.e. travelling to Three Bridges rather than starting a rail journey from a more local station. The completion of the Thameslink programme and anticipated introduction of a new Thameslink franchise during the plan period is likely to increase the attractiveness of Three Bridges Station for this activity which will, in turn, lead to increased on-street parking pressures unless satisfactorily addressed. The County Council is keen to see a comprehensive plan for Three Bridges Station developed which seeks to address these issues and gives greater certainty as to the future role of the station.
Bill Temple-Pediani	KTI Energy Limited			You must co-operate with Horsham District Council on any infrastructure relating to decentralised generation and distribution of electricity and heat.
John Cooke	Mobile Operators Association			SEE FULL REP - In short the MOA are suggesting a policy relating to telecommunications development within the borough and provide reasons for such a policy.
John Cooban				<p>The new local plan needs to include a comprehensive Tree Strategy – preferably a complete section in its own right, or at least its own section in Environment or maybe even Infrastructure, on the basis that Green Infrastructure should be considered at least as the same level as any other element of infrastructure, and that trees are the most important element in green infrastructure.</p> <p>The starting point for tree strategy might be the Trees in the Townscape document produced by TDAG, and Trees in Towns II.</p> <p>It needs to deal with all urban tree cover as a continuum, certainly looking beyond 2029. Presently, CBC is not coordinated at present re trees. It is about all tree cover, regardless of ownership. It is crazy that Planning and Amenity services have separate tree databases.</p> <p>You won't get a proper tree strategy though, unless you get</p>

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
				<p>tree key personnel at high level and change culture.</p> <p>We are really lucky with our new town tree cover, and rather take it for granted. We really need to look after it better into the future for all sorts of reasons.</p> <p>The strategy needs to identify and iron out the main areas of discontinuity that exist at the moment. E.g. using development control as a systematic arboricultural process for protecting, maintaining, enhancing, renewing and monitoring urban tree cover as land passes through your scope. Getting the right scheme content to start with, rigorously applying BS 5837, making sure you can enforce the tree / landscape related Conditions, and making sure that essential tree planting is thriving before the end of your 5 year control time-out.</p> <p>Etc.</p> <p>I started looking at your individual tree related policies, like CH3 f) would be better to refer to numbers of new replacement trees of a specified size (e.g. 16-18cm girth) being related to the size of trees being removed e.g. 1 new tree per 100mm stem diameter of tree being removed.</p> <p>But these are details. Get a strategy first.</p>
Camelle Bell	Thames Waters		IN1	We support Policy IN1 in principle, but consider that it does not go far enough in relation to waste water/sewerage infrastructure in particular and therefore needs to be amended or a new policy added. SEE FULL REP FOR MORE TEXT...
Brenda Burgess				Can we do anything about road improvements?
Jane Noble	West Sussex Local Access Forum			It also recognises the important part played by green infrastructure in providing access across the Borough. This is especially true of public rights of way (green corridors), which provide links from within the development to the wider countryside. New development can provide a unique opportunity to solve present problems and provide missing links in the network of prows, which are the principal means to access the countryside. This will enhance the ability of local people, both existing and new residents, to enjoy access to the countryside, and is particularly important as Crawley is predominantly an urban borough.
Jenny Frost	Ifield Village Conservation Area Advisory Committee			<p>General</p> <p>IVCAAC: pleased to see that:</p> <ul style="list-style-type: none"> <li>• Ifield Station improvements are to be considered</li> <li>• Ifield Meadows (south and those in the conservation area) are given high profile</li> <li>• The Village Green is mentioned</li> <li>• No building outside the built up area boundary is to be permitted.</li> </ul> <p>Locally listed buildings</p>

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
				<p>There is no mention of the locally listed buildings in the area (as opposed to the nationally listed buildings, which are mentioned). Was there a reason for this?</p> <p>Extension of the conservation area IVCAAC supports the extension of the conservation area and sent a separate, detailed document about this on 29 November 2012.</p> <p>Area of Special Character IVCAAC supports the designation of the 'Arts and Crafts' houses in Rusper Road as creating an Area of Special Character. We think that Horsham should be alerted to this as some of the buildings continue into the Horsham section of Rusper Rd. (although there is one where the features have been covered with white plaster and blue shutters).</p> <p>Loss of protection? IVCAAC is sorry that the four large houses and gardens in Rusper Road north east of the Arts and Crafts style houses, which were previously in the area of Special Environmental Quality (a designation that is to be removed) may not be well protected. Do other policies give these houses protection from being knocked down and replaced by higher density housing that would be out of place in the road?</p>
Sally Stallan	Horsham District Council			<p>From the vision statement of Crawley 2029 we understand another aim is that growth will be sustainable and supported by an infrastructure plan that complements development. We note that one of the concerns raised through your issues and options consultation was the capacity of the existing highway network and its capability to manage further growth within and outside the borough, in particular, junctions 9, 10 &amp; 11 of the M23 have been recognised as busy interchanges that may require upgrading. We are mindful of any development which could have a negative impact on our transport corridors by way of increased congestion. We therefore request that you keep both ourselves and West Sussex County Council as Highways Authority informed of any development proposals that may have an impact upon this location.</p>
Peter Mason	Tandridge District Council		IN3	<p>It is considered that as part of wider transport infrastructure enhancement, an extension of Fastway to East Grinstead should be investigated. Securing the extension of the Fastway system to Redhill was supported in principle, however, it is considered that the villages of Godstone, Bletchingley and Nutfield along the A25 in Tandridge District should be linked into Fastway at Redhill as a quality bus priority route corridor with appropriate measures being included such as public transport information boards, high quality bus stops with shelters, seating and real time passenger information displays. Similarly Smallfield should be linked into Fastway at Horley.</p>
Mike	NHS Sussex			SEE FULL REP - comments made in regard to CIL and

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
Pritchard				healthcare facilities
Jennifer Wilson	Environment Agency		IN1	We note that neither flood defences/mitigation measures nor GI have been included within the definition of Infrastructure either as part of this policy or in the glossary. They should be, in support of your GI policy and from a flood defence perspective, as they protect dwellings.
Jennifer Wilson	Environment Agency		IN5	As above for IN1.
John Lister	Natural England			<ul style="list-style-type: none"> <li>• New development should ensure there are existing or planned facilities and services (including transport, education and health services) to support a growing population.</li> <li>• Facilities and services should continue to be provided close to where people need them.</li> <li>• The railway links are a vital part of our town and the Local Plan should continue to support and encourage the upgrading of both Crawley and Three Bridges stations.</li> </ul> <p>Natural England agree to all three points, as each would lead to a more sustainable pattern of development. Encouraging development within proximity to existing or planned facilities or services ensures there is a local and generally accessible option for new residents. Natural England support the enhancement of the railway links as a means of delivering sustainable transport.</p>
John Lister	Natural England		IN1 & IN3 & IN5	Encouraging new developments to be permitted where there is existing infrastructure, services, facilities (IN1) and where there are sustainable travel patterns (IN3) is supported by Natural England as this would encourage a sustainable pattern of development as highlighted within the NPPF. Furthermore the strategy within policy IN5 is to locate community facilities close to neighbourhood centres. These areas are often the more accessible areas for a variety of transport modes and so accessible for most people. Natural England note and support the reference within policy IN3 for the requirement of travel plans where development creates significant transport implications.

## Category 8: Gatwick Airport

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	GAT2	<p>It is acknowledged that land safeguarded for a potential second runway at Gatwick is a major constraint on finding sufficient land suitable for housing and economic development.</p> <p>It is also accepted that airport safeguarding is a national policy driver.</p> <p>However, given the Davis Commission investigation into the future of London's airports and other potential locations for new capacity to be developed, there is uncertainty as to whether a second runway will be required and if so what form it will take.</p> <p>It is also understood that the safeguarding area is the estimated maximum requirement for a second wide spaced runway. Further evidence refining the precise requirements will be submitted to the Davis Commission from spring 2013.</p> <p>Given the above, and the need to find more land for housing and employment, it is considered necessary that the safeguarding policy, GAT2, should include a reference to reviewing the safeguarded area on the receipt and analysis of additional information to, and conclusions from, the Davis Commission.</p>
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	GAT2	<p>The potential of this land must be reviewed once additional information is submitted to the Davis Commission in spring 2013 and once the Commission reports in winter 2013 and summer 2015. This must be reflected in Policy GAT2.</p>
Chris Owen	West Sussex County Council		GAT1	<p>Growth at Gatwick Airport will have a significant impact on surface access in addition to the environmental issues already covered by proposed Policy GAT1. Although covered by other policies in the Plan, given the significance of the impact on the local area, it is felt that reference should be made to impact on surface access in the Gatwick Airport policies, particularly as current Policy GAT5 is not being directly replaced. It is suggested that reference to surface access is added to part (ii) of the policy to ensure that the impact of growth on surface access can be satisfactorily mitigated in line with Local Plan Objective 9.</p>
Jack Straw	Mole Valley District Council		GAT1	<p>12. The provisions of Policy GAT1 are noted and reflect the aspirations of Gatwick Airport Ltd which are contained in the 2012 Gatwick Master Plan. The requirements of criterion (ii) are agreed as far as they go but we would wish to see it expanded so that the list of passenger growth consequences to be mitigated includes the visual impact of new development (thinking here of the Master Plan's indication of additional hangars in the North West Zone), the surface traffic consequences of additional passengers and the general urbanisation effects that will come with the growth of the airport to 45 million passengers.</p> <p>13. It is not clear whether the new legal agreement referred to in the second paragraph of the reasoned justification to Policy GAT 1 is the same agreement that will emerge from the review of the 2008 agreement (i.e. as referred to in the</p>

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				first paragraph of the reasoned justification) or whether it is an entirely new one. We believe that the review of the 2008 agreement should set in place the requirements necessary to mitigate the consequences of the airport handling 45 million passengers.
Jack Straw	Mole Valley District Council		GAT3	14. We note the reference to Gatwick's emerging new parking strategy in the second paragraph of the reasoned justification to Policy GAT3. It indicates that the strategy is looking to address the issues arising from a 40 million annual passenger throughput. There is an argument for the strategy to address the consequences of a 45 million throughput as this is what the airport operator indicates in the Master Plan is achievable by 2030. It would be appreciated if the Borough Council could take this up with the airport operator as work progresses on the parking strategy.
Peter Mason	Tandridge District Council		GAT1	<p>As far as the District Council is aware, it has not been demonstrated that the proposed expansion up to 45 million passengers per annum is compatible with the transport infrastructure and environmental character in the area, having regard to the likely level of traffic generation from the Airport and the adequate availability of alternative transport modes.</p> <p>The District Council is opposed, in principle, to a second runway at Gatwick Airport which could lead to those communities which suffer noise at present having increased noise. Noise impacts could increase significantly so affecting a number of communities in the southern part of the District. This would be unacceptable, and exemplifies the insuperable difficulties of further expansion of the Airport and, therefore, the District Council supports the operation of Gatwick Airport remaining as a single runway, two terminal airport.</p>
Peter Mason	Tandridge District Council		GAT2	It is considered that no action is required to deal with the possibility of a second runway beyond the requirement to safeguard land.
Peter Mason	Tandridge District Council		GAT3	One of the effects of Gatwick Airport on the District is that there is pressure for off-airport parking in the vicinity of the airport. The Council wishes to see any identified shortfall in provision for parking provided within the airport and accordingly the wording of the policy to include "airport parking will only be permitted within the airport boundary" is welcome.
Tim Hoskinson	Savills	Wilky Group		SEE FULL REP....As currently set out, the approach to safeguarded land in Policy GAT2 represents an unnecessary burden to the delivery of the Gatwick Green proposals, and we would urge the Council to seek to address this potential barrier to investment through a positive and proactive approach to formulating a suitable safeguarding policy in co-operation with the airport operators and the Wilky Group. The airport's owners have recently confirmed that they will be preparing detailed plans for a second runway for consideration by the Davies

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				Commission on airport capacity. As part of this work, the Wilky Group will seek to work with the airport owners and the Council to ensure that appropriate safeguarding boundaries can be drawn up to exclude the land that is not required for airport operational purposes associated with a second runway.
Mark Bewsey	Savills	Homes and Communities Agency	GAT2	Comment – The HCA has significant landholdings within the Gatwick Safeguarding Area. The land at Rowley Farm sits to the north west edge of the Manor Royal Business District. If the safeguarding designation was not in place, this land would be an ideal location for extension to the built up boundary.
Rob Matthews	Gatwick Airport Ltd.		GAT1	<p>The Gatwick Master Plan (July 2012) outlines the future plans for the growth of the Airport to 2030 and with the airport potentially handling up to 45 mppa with its existing single runway / two terminal configuration. It incorporates the strategic aims and objectives of the Airport to meet future growth and anticipated demand, through developing the Airport and ensuring its safe and efficient operation. The Master Plan is prepared in consultation with Crawley Borough Council and many other stakeholders and has historically informed local planning policy relating to the airport.</p> <p>In 2011, Gatwick handled 33.7 million passengers, the total number of aircraft movements was 251,070 and 88,214 tonnes of cargo was carried. Growth forecasts were undertaken to inform the Master Plan and take into account the current economic position of the UK and Europe and the effects of growth at other airports in the south east. These predict a steady increase in passenger numbers at Gatwick, rising to 36 mppa by 2015/16, 40.2 mppa by 2021/22 and potentially 45mppa by 2030.</p> <p>In order to facilitate the projected growth, a number of operational developments will be needed to serve the increased passenger and aircraft numbers, as well as associated airside and landside support services. The Master Plan identifies the existing land uses at the Airport, including approximately 22 hectares of unallocated land within the airport boundary and outlines the types of developments and techniques that may be required moving towards 40mppa and thereafter potentially to 45 mppa. These include:</p> <ul style="list-style-type: none"> <li>Optimise the use of existing infrastructure;</li> <li>New infrastructure to support new, more efficient aircraft types;</li> <li>Expansion and improvement of the North and South Terminals;</li> <li>Replacement and extension of aircraft piers;</li> <li>Reconfiguration of maintenance hangars and facilities;</li> <li>Reconfiguration of existing, and introduction of new car parking;</li> <li>Re-surfacing of the main runway and reconfiguration and upgrading of taxiways;</li> <li>Surface access improvements;</li> </ul>

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				<p>Development of on-site energy centres.</p> <p>The Master Plan shows that the projected growth in passenger traffic is achievable within the safe operational limitations of the Airport as a single runway / two terminal airport and will be balanced with appropriate mitigation of environmental impacts.</p> <p>The current draft of policy GAT1 supports and protects the development of facilities contributing to the safe and efficient operation of Gatwick as a single runway, two terminal airport, as it expands up to 45 mppa.</p> <p>The policy also seeks to ensure that any environmental impacts are mitigated and it makes reference to the Section 106 agreement which is in place to ensure sufficient mitigation is achieved.</p> <p>Save for the following point GAL is, therefore, wholly supportive of policy GAT1.</p> <p>The only point that GAL wishes to comment on is the reference to “Climate Change” in criteria (ii) of the policy. That is the need to “mitigate the impact of the operation of the airport on .....Climate Change.”</p> <p>GAL is committed to managing and minimising the impacts of the airport’s development including the climate change impacts that are within its control. These include for example the way buildings are designed so as to be energy efficient in their construction and operation, the adaption of facilities to climate change and managing surface access demands so as to reduce greenhouse gas and other emissions which contribute towards climate change. GAL’s commitment to carbon management and reduction is set out in GAL’s Decade of Change and Carbon Management Action Plan.</p> <p>There is, however, a wider debate about aviation’s global impacts on climate change through emissions from aircraft in flight. GAL is concerned that the way the policy as drafted could be interpreted as meaning that GAL also needs to control these wider impacts of aircraft operations from Gatwick (i.e. the emissions from aircraft flying to and from Gatwick) when bringing forward developments. These matters are not within GAL’s control but are subject to national, European and international commitments and actions including carbon emissions trading aircraft engine technology, airspace efficiency improvements. GAL does of course, seek to influence changes that will reduce aviation climate change impacts that are outside its control, but does not have direct control on these wider initiatives. This interpretation could also be inferred due to other policies in the draft plan which seek to limit and reduce carbon emissions, for example ENV1, ENV5 and IN3.</p> <p>Suggested Changes to Policy GAT1</p>

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				For the above reasons GAL considers that the reference to 'climate change' in criteria (ii) of the policy should therefore be removed.
Rob Matthews	Gatwick Airport Ltd.		GAT2	<p>Draft Local Plan Policy</p> <p>The current draft policy GAT2 seeks to continue safeguarding the identified land for a potential second runway against development that would be incompatible with the expansion of the airport and development of a second runway. The policy is worded exactly as the existing Crawley Core Strategy Policy G2.</p> <p>The draft policy goes on to broadly identify minor works that may be permitted within the safeguarded area.</p> <p>GAL supports the principle of Policy GAT2 and the continued safeguarding of land for a potential second runway. This reflects the existing requirement for safeguarding set out in the ATWP and Draft Aviation Policy Framework and is a sensible and far-sighted approach given the current uncertainty on future aviation policy, alongside Government commitment to economic growth guided by new planning legislation and the NPPF which focuses on economic growth and sustainable development.</p> <p>Since the existing policy was adopted in 2007 there have been a number of planning applications that have been considered against Policy G2. Based on this experience GAL considers it would be appropriate to seek to increase the clarity in Policy GAT2 as to development which will and will not normally be accepted.</p> <p>Suggested Changes to Policy GAT2</p> <p>Whilst GAL supports the policy, GAL considers it would nevertheless be helpful if the policy itself were now to provide greater clarity of those uses and types of development that would be compatible with future development, and those which would not. SEE FULL REP...</p>
Rob Matthews	Gatwick Airport Ltd.		GAT3	<p>The current draft policy GAT3 restricts all future new and replacement airport-related parking to within the airport boundary, demonstrating the need in the context of a sustainable approach to surface transport access to the airport.</p> <p>GAL fully supports the draft policy and the control it places over any future airport-related car parking proposed off-airport.</p> <p>GAL is committed to working with CBC to regulate and control the level of airport-related car parking provided compatible with mode share targets and aspirations, and where it can to support LPAs in enforcing against unauthorised car parking. As identified in the Gatwick Master Plan and ASAS, there is sufficient capacity on airport to accommodate the unauthorised off-airport parking, as well as future predicted demand, without</p>

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				<p>prejudice to the current and future operational needs of the airport. This will also be demonstrated in the revised Car Parking Strategy.</p> <p>In conclusion GAL supports Policy GAT3 as proposed.</p>
Rob Matthews	Gatwick Airport Ltd.		GAT4	<p>In order for GAL to realise opportunities for commercial development and to achieve the anticipated economic growth benefits, greater flexibility in planning policy is required relating to land within the airport boundary, whilst not prejudicing the current and future operational requirements of the airport.</p> <p>The current draft policy wording for GAT4 is as follows:</p> <p>“Permission for the loss of airport-related office floorspace within the airport boundary will only be permitted if it can be demonstrated that it will not have a detrimental effect on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it expands.”</p> <p>The wording is limited to the loss of office floorspace. This is possibly a reflection of two recent developments at the airport where the Council has granted permission for office buildings to be changed to hotels, having been provided with evidence that the offices were surplus to existing and future operational requirements.</p> <p>GAL fully support this policy and agrees with the principle of allowing greater flexibility for existing uses, in order to make more efficient use of land.</p> <p>In addition, GAL also fully supports the requirement for any proposals for the loss of office floorspace to demonstrate that it would not prejudice the operational needs of the airport. The continued efficient operation of the airport and ensuring its ability to grow within agreed limits is paramount to GAL.</p> <p>Expanding from these principles, GAL would also like to see greater flexibility for commercial use of other on-airport land and buildings, thereby allowing non-airport related commercial development to take place provided existing and future operational requirements are not prejudiced. The following additional wording is suggested for Policy GAT4, to read as follows: SEE FULL REP</p>
Rob Matthews	Gatwick Airport Ltd.			<p>SEE FULL REP.... Promoting sustainable economic growth is a key priority which is reflected in national and local planning policy. The suggested alterations to GAT4 identified in these representations will conform with this priority and the objectives of other national and local policies.</p> <p>It has been identified that there is significant economic benefit that can be created by allowing nonairport related commercial development within the airport boundary, without impacting the operational requirements of the airport now or in the future. Any proposals that come</p>

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				forward under the suggested alterations will also be tested against all other relevant policies in the Crawley Local Plan 2029, ensuring the development would be appropriate and sustainable.
Rob Matthews	Gatwick Airport Ltd.		NEW	<p>In accordance with paragraph 28 of Annex 2 of Circular 01/2003 - Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas: The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction (2002) - it is suggested that the plan should also include a new policy which covers aerodrome safeguarding requirements of developments. GAL suggests the following wording</p> <p>"Aerodrome Safeguarding</p> <p>Development must comply with Aerodrome Safeguarding Requirements to ensure that the operational integrity and safety of Gatwick Airport is not compromised."</p> <p>The supporting text would explain that aerodrome safeguarding as a statutory function, the purpose of which is to ensure development does not compromise the safety of aircraft operations.</p> <p>Developments within and close to Gatwick Airport will be subject to consultation with GAL Aerodrome Safeguarding to be checked to ensure it would not compromise safety. In the case of certain developments, there may be restrictions on height and the design of buildings to protect radar, or the landscaping of development to avoid development presenting a risk which could lead to the hazard of aircraft bird strikes.</p>
John Lister	Natural England			<p>Airport parking should be located within the boundary of the airport to reduce congestion and promote "greener" travel arrangements.</p> <p>Natural England support the encouragement of green travel arrangements.</p>
John Lister	Natural England			<p>Gatwick should remain a one runway, two terminal airport.</p> <p>This is not within the remit of Natural England</p>
John Lister	Natural England		GAT1	<p>Natural England emphasise the importance of the safeguards to mitigate the operation of the airport on the natural environment as highlighted in point ii of policy GAT1; the impact of the extended airport on noise, air quality, flooding and climate change will all need to be considered and regularly monitored.</p> <p>Natural England consider airports in general to have a negative impact on the natural environment. The policy justification text mentions that the initial S106 agreement which related to the environmental impact of the growth of the airport is due for re-negotiation by 2015. Natural England support the ongoing protection and enhancement</p>

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				of the natural environment within the area.

## Category 9: Neighbourhoods

Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
Ian Miller	Tinsley Lane Residents Association		Three Bridges	<p>Tinsley Lane is a discrete residential area bounded on two sides by the Manor Royal Business District and separated from Pound Hill and the rest of Three Bridges by the railway line and Crawley Avenue motorway link road. Within these defined boundaries, and with a mix of housing styles, many dating from before the New Town, it has developed a village like community with a strong local identity which should be protected and enhanced within the Local Development Framework. The unique semi-rural characteristics of Tinsley Lane should thus be protected by designating it to be an Area of Special Environmental Quality.</p> <p>Shielded from the railway line by Summersvere Wood (protected Ancient Woodland and home to a range of wild-life) this area could be utilised as a valuable recreational facility by the addition of nature trails etc. There are also three sports fields (two leased by Oakwood football Club) owned by the Homes and Communities Agency, which have been identified as having development potential.</p> <p>Oakwood F.C. has several boys and girls football teams covering all age groups and provides an extremely valuable service in developing our young people but it needs more funding to bring its facilities up to modern standards. This was discussed with the previous owner, English Partnerships, and a draft development plan was proposed in 2003 to build houses on the north sports field while maintaining the southern half for recreation. This plan was however not considered to be viable at the time.</p> <p>Ideally these sports fields could be retained for recreation with enhanced facilities at Oakwood F.C. to include an open play area for children of residents. If this is not possible then a sustainable low density development project could be economically viable if a commuted payment from the development could be allocated to redevelop the Oakwood F. C. facilities in recognition of the contribution they make to the youth of the Borough. A low density would be necessary to avoid overloading the drainage and sewerage systems which are already close to capacity and the only practical traffic access would not be able to cope with any increase in usage without considerable adverse effect on existing properties.</p> <p>As the LDF has identified a shortage of skilled labour and of family homes this small site could be allocated for low level aspirational housing which respects the character of the surrounding area and minimises the impact on the adjacent bungalows.</p> <p>The proximity of the Manor Royal Business District</p>

Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
				<p>makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the site ideal for family housing.</p> <p>With new recreational facilities centred on Oakwood football Club, Tinsley Lane could become a distinct individual area of Special Environmental Quality of which Crawley could be proud.</p>
Collin Lloyd			Tilgate	<p>Thank you. I trust the document contains policies which are sufficiently robust to protect small areas of green space in residential areas from development. As an example of what I mean I cite the most unfortunate decision of the council's cabinet to make available for consideration for development the green at Ely Close in Tilgate and to explore the feasibility of development on other similar greens, such as at Chichester Close. Typically these are obscure and micro locally highly valued places which have lain undeveloped since the advent of the New Town in the early 1950s and which play their part in contributing to the green character of Crawley. I hope the councillors who have been working on the new document have been alive to the possibility that the green character of Crawley could be vulnerable to progressive erosion unless the planning policies are in place to enable confident resistance by this and future generation of planners and councillors.</p>
Brenda Burgess			Three Bridges	<p>Conservation. Attempt to keep Three Bridges Station - or at least the front facade - as this is an historical to Three Bridges as it represents the original 19th Century New town of the railway era. Also conserve Montefiore hall and Sensitive building with in the neighbourhoods</p>
Brenda Burgess			Three Bridges	<p>Fewer office blocks unless we know they are going to be occupied.</p>
Brenda Burgess			Three Bridges	<p>Investigating the transformation of some office blocks to living space. If the old docks can be converted in London and other cities, then why not our obsolete unwanted office block, many of which are new.</p>
Brenda Burgess			Three Bridges	<p>Bring forward the green fields of Tinsley lane. I don't just mean the football club. Infact I think that could stay as there are no other facilities for the young in that area. There are other fields owned by HCA - think rented to Rentakill at some point. It might mean adjusting the roads such as bringing through an access from one of the closes. During such a development, or even if one is not possible, we desperately need play areas in the Tinsley lane area. Tinsley lane is surrounded by major busy roads and there is no where locals for children to play safely.</p>
Brenda Burgess			Three Bridges	<p>Can we do anything about road improvements?</p>
Brenda			Three Bridges	<p>Living in the Town centre? Might not be appropriate</p>

Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
Burgess				to have social housing in the area of Town centre.
Brenda Burgess			Three Bridges	Mixture of housing both Social and desirable.
Brenda Burgess			Three Bridges	Keep and conserve the Town hall as an historic building of Crawley and a representation of 60's architecture. Same for College tower. (This does not mean that we should not renovate the offices at some point)
Jenny Frost	Ifield Village Conservation Area Advisory Committee		Ifield	<p>General IVCAAC: pleased to see that:</p> <ul style="list-style-type: none"> <li>• Ifield Station improvements are to be considered</li> <li>• Ifield Meadows (south and those in the conservation area) are given high profile</li> <li>• The Village Green is mentioned</li> <li>• No building outside the built up area boundary is to be permitted.</li> </ul> <p>Locally listed buildings There is no mention of the locally listed buildings in the area (as opposed to the nationally listed buildings, which are mentioned). Was there a reason for this?</p> <p>Extension of the conservation area IVCAAC supports the extension of the conservation area and sent a separate, detailed document about this on 29 November 2012.</p> <p>Area of Special Character IVCAAC supports the designation of the 'Arts and Crafts' houses in Rusper Road as creating an Area of Special Character. We think that Horsham should be alerted to this as some of the buildings continue into the Horsham section of Rusper Rd. (although there is one where the features have been covered with white plaster and blue shutters).</p> <p>Loss of protection? IVCAAC is sorry that the four large houses and gardens in Rusper Road north east of the Arts and Crafts style houses, which were previously in the area of Special Environmental Quality (a designation that is to be removed) may not be well protected. Do other policies give these houses protection from being knocked down and replaced by higher density housing that would be out of place in the road?</p>
Mark Bewsey	Savills	Homes and Communities Agency	Northgate	Comment – The Kilnmead site falls within the Northgate area. This site is suitable for a residential development and should therefore be included as a suitable and deliverable site within the list for the Northgate area on page 173. Part of the Gatwick Safeguarding Area falls within the Northgate area. Reference should be made to this under the 'Character and Environment' section on page 173.

Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
Mark Bewsey	Savills	Homes and Communities Agency	Three Bridges	Comment – The land East of Tinsley Lane falls within the Three Bridges area. The site is suitable for a residential development and should therefore be included as a suitable and deliverable site within the list for the Three Bridges area on page 185.

## Category 10: Sustainability Appraisal

Name	Organisation	On Behalf of:	Page/Para	Sustainability Appraisal Comments
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner		<p>It is noted that Sustainability Objective 4 seeks 'To ensure that everyone has the opportunity to live in a decent and affordable home'. This objective is strongly supported and entirely consistent with the NPPF.</p> <p>However in considering the housing strategy to supply just 245 units a year in Policy H1, it is not clear how the scoring is reflected (a single negative mark is given) in comparison with additional parking at Gatwick receives a double negative mark. This inconsistency needs to be addressed prior to submitting Crawley 2029 to the Secretary of State.</p>
Chris Owen	West Sussex County Council		Appendix C	<p>Topic Area B – Heritage, Character, Design and Architecture</p> <p>Paragraph B8: The Crawley Extensive Urban Survey (EUS) is referenced as part of the Sussex EUS, which is noted and welcomed. However paragraph 170 of the NPPF refers to “landscape character assessments...integrated assessment of historic landscape character” and in this respect there is scope to refer to the Sussex Historic Landscape Characterisation (HLC) as a useful source of historic land use data and character outside the urban area. It is noted that the Sussex EUS is discussed in terms of “is being prepared” but it is now complete and therefore ‘is being...’ should be changed to ‘has been’.</p>
Chris Owen	West Sussex County Council		Appendix C	<p>Topic Area F – Transport and Infrastructure</p> <p>Paragraph F14 - Table: It is suggested that the clarity of the indicator information given be reviewed including whether the indicator explains specifically what is measured e.g. under F3 it is not clear what the 81% (2008) figure for West Sussex actually means.</p> <p>Generally the data sources given refer to local information collected by WSCC rather than the NIs themselves. In some instances it may be worth reviewing whether there may be more up to date information available. For example, it is assumed that the rail use data comes from Office of Rail Regulation statistics available on the following website and the most recent data is from 2010/11: <a href="http://www.rail-reg.gov.uk/server/show/nav.1529">http://www.rail-reg.gov.uk/server/show/nav.1529</a></p> <p>It may be useful to take a look at West Sussex Local Transport Plan monitoring indicators which are the indicators that we are using in the absence of a National Indicator Set. These cover similar themes to those highlighted in the Sustainability Report. The most up-to-date monitoring will be posted on our website and updated periodically:</p>

Name	Organisation	On Behalf of:	Page/Para	Sustainability Appraisal Comments
				<a href="http://www.westsussex.gov.uk/your_council/plans_projects_reports_and/plans/west_sussex_transport_plan/west_sussex_transport_plan_mon/west_sussex_transport_plan_mon.aspx">http://www.westsussex.gov.uk/your_council/plans_projects_reports_and/plans/west_sussex_transport_plan/west_sussex_transport_plan_mon/west_sussex_transport_plan_mon.aspx</a>
Elizabeth Burt	Savills	Crest Strategic Projects		<p>CSP has reviewed the draft Sustainability Appraisal (SA) Report supporting the draft Local Plan. It supports paragraphs 2.16 and 2.17 that “Further growth into neighbouring authorities cannot be ruled out at this stage if further growth is required” (para 2.17). It goes on to state that therefore the draft SA could be applied to areas beyond the boundary of Crawley during the life of the plan and that the extent of the Plan area will be kept under review and updated as appropriate in future consultations. CSP supports the identification of the need to assess growth opportunities outside the Borough boundary, however it recommends that this assessment is undertaken now and potential sites outside the Borough identified to contribute towards the delivery of housing.</p> <p>CSP recognises that three key sustainability issues affecting the Borough are identified as housing stock not matching the need and aspirations of the Borough over the next 20 years, limited affordable housing which does not match need and limited land supply in the Borough. This clearly calls for policies, a housing target and housing delivery strategy, including the identification of suitable sites, which can address these issues within the lifetime of the plan.</p>

## Category 11: Evidence Base Documents

Name	Organisation	On Behalf of:	Document	Page /Para	Evidence Base Document Comments
Katherine Harrison	Surrey County Council		Draft Infrastructure Plan	p.10	With regard to waste management, there appears to be an error on page 10 of the Draft Infrastructure Plan where it is stated that general household waste goes to existing landfill in Warnham. This is contrary to the Environment Agency's Waste Data Interrogator 2010 which indicates that Crawley exported 15 tonnes of hazardous waste, 1,971 tonnes of inert waste and 19,282 tonnes of household / industrial and commercial (HIC) waste to Surrey in 2010. Almost all the HIC waste exported from Crawley to Surrey was disposed at Patteson Court Landfill, Redhill. Void space at Patteson Court landfill is coming under increasing pressure, and 75.5% of waste disposed of at this site came from outside Surrey in 2010. We therefore welcome the aim and strategic principle of the Plan to limit the generation of household and other waste as this will reduce the need to export waste to Surrey for final disposal.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	Boundary Review		<p>It is noted that the Council undertook a boundary review to assist in identifying new sites for development and other uses. Whilst some land around the western fringes has been identified as having some potential, and that potential is not quantified precisely, it is considered this will not meet the identified shortfall. Given this, it is surprising that part of the land south of Antlands Lane which falls outside the airport safeguarding zone and adjacent to the north east sector, was not considered as part of the boundary review. This omission calls the soundness of this work into question and it should be reviewed accordingly.</p> <p>The owners of land south of Antlands Lane have previously submitted information that demonstrates that the site has no transport, landscape or ecological constraint that would preclude its development. That work also established that the site is within a sustainable location suitable and capable of accepting further development. The south eastern corner lies outside the airport safeguarding zone.</p>
Chris Owen	West Sussex County Council		Draft Infrastructure Plan		<p>Waste and Recycling Services Current provision: The following amendments to text are proposed (deletions are crossed through, additions are in red and underlined) –</p> <ul style="list-style-type: none"> <li>• Household Waste Recycling Site &amp; Transfer Station, with a combined capacity of 45,000 tonnes per annum, opened in 20082006 on</li> </ul>

Name	Organisation	On Behalf of:	Document	Page /Para	Evidence Base Document Comments
					<p>Manor Royal off Metcalf Way. The Household Waste Recycling Site has a catchment area of 5 mileWaste and Recycling Services</p> <p>Current provision: The following amendments to text are proposed (deletions are crossed through, additions are in red and underlined) –</p> <ul style="list-style-type: none"> <li>• Household Waste Recycling Site &amp; Transfer Station, with a combined capacity of 45,000 tonnes per annum, opened in 2006 off Metcalf Way. The Household Waste Recycling Site has a catchment area of 5 miles.</li> <li>• General household waste goes to existing landfill Brookhurst Wood near Horsham. Construction of a new waste treatment facility at Brookhurst Wood is programmed for completion in 2013.</li> </ul> <p>Transport - Road Current provision: The following amendments to text are proposed –</p> <ul style="list-style-type: none"> <li>• A23 runs in a north - south direction through the town</li> </ul> <p>Transport – Rail Current provision: Southampton should be added to the list of principal destinations.</p> <ul style="list-style-type: none"> <li>• General household waste goes to existing landfill in Warnhamat Brookhurst Wood near (Horsham District). Construction of a new waste treatment facility at Brookhurst Wood is programmed for completion in 2013.</li> </ul>
Paul Burgess	Lewis & Co Planning	Flint Cottage and Kilravock	Boundary Review		<p>SEE FULL REP.... "The draft Local Plan logically proposes to extend the settlement boundary to include the K2 Leisure Centre, Broadfield Park, Broadfield House, Thomas Bennett College, the A23 (and accompanying highway signage and infrastructure) and Tilgate Business Park. Whilst the houses adjacent to the A23 are predominantly surrounded by these developments they have not been included within the boundary. The inclusion of these dwellings would not only meet the Council's criteria for determining the built up area boundary but would be consistent with the approach taken elsewhere in the Borough (e.g. Whitehall Drive). In order to be consistent in the approach taken, we therefore request that the settlement boundary is amended further to include these properties."</p>
Tony Fullwood	Tony Fullwood	Mr M Robinson	Boundary Review		<p>The Built Up Area boundary should be amended to include Oaksworth and garden land, Worth to enable residential development</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Document	Page /Para	Evidence Base Document Comments
	Associates				(see Map at Appendix 1). The Borough Council has assessed the 13 hectare area currently outside the BUAB and within the M23 Motorway as a whole. This is not the only option which needs to be appraised. Indeed, this would not be the preferred option in respect of this objection. This objection seeks a minor amendment to more accurately define the built area at Worth and to reflect the potential of the Oaksworth site which is recognised in the Borough Council's evidence base... SEE FULL REP
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	Draft Urban Capacity Study		Whilst undertaking the Built Up Area Boundary survey a small number of sites were highlighted for further assessment as part of the Urban Capacity Study. The Council have stated that whilst these sites may currently relate more to the countryside than the urban area, further assessment could allow a limited amount of development without impacting on the character of the area. A list of these sites will be assessed prior to the Site Allocations Consultation in Spring 2013. It is requested that the Oaksworth site is added to the list of sites for review.
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	Boundary Review		The Built Up Area boundary should be amended to include land off Saxon Road, Worth to enable residential development (see Map at Appendix 1). The Borough Council has assessed the 13 hectare area currently outside the BUAB and within the M23 Motorway as a whole. This is not the only option which needs to be appraised. Indeed, this would not be the preferred option in respect of this objection. This objection seeks a minor amendment to more accurately define the built area at Worth and to reflect the potential of the Saxon Road site which is recognised in the Borough Council's evidence base. ...SEE REP FOR MORE
Jane Noble	West Sussex Local Access Forum		Draft Infrastructure Plan		The Draft Infrastructure Plan states that there is already a good cycle network but recognises that as there are gaps there is potential for further improvement which is to be welcomed. The Forum feels the Plan should make reference to the West Sussex Rights of Way Improvement Plan (RoWIP), details of which can be found at: <a href="http://www.westsussex.gov.uk/rowip">www.westsussex.gov.uk/rowip</a> .
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	SHLAA		SEE FULL REP - It is a general concern of both my clients that the council has failed to identify sufficient land to meet identified housing needs. It is noted that the councils proposed supply of sites only amounts to circa

Name	Organisation	On Behalf of:	Document	Page /Para	Evidence Base Document Comments
					<p>240 dwellings per annum when there is recognition that there is a need for 500+ dwellings per annum.</p> <p>In order to rectify this shortfall it is considered that the additional land should be identified for housing. Whilst this will need to be the subject of a further borough wide review, PH and TW will endeavour to work with officers at the Council to identify additional housing opportunities in and around the consented NEW Sector site where they can be integrated into the master plan for the area.</p> <p>Officers will be aware that additional housing land was identified in the previous Local Plan and the Core Strategy for the larger neighbourhood of 2,700 dwellings. It is recognised that there are constraints that affect the residual land (in particular Safeguarding and noise from Gatwick Airport) and that the Council has identified land off Steers Lane for an additional 100 units. However it is considered that further development might be possible to the south east of the consented NES Site.</p>
Elizabeth Burt	Savills	Crest Strategic Projects	DRAFT PROPOSALS MAP		<p>This map identifies that the Kilnwood Vale site is covered by a landscape character edge designation. There does not however appear to be any identification or definition of what this is. The site is an allocated site for a new neighbourhood and has consent for approximately 2,500 dwellings. It is therefore unclear why this designation has been placed on the site and CSP requests its removal.</p>