

CRAWLEY BOROUGH COUNCIL

MANOR ROYAL DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT AND PUBLIC REALM STRATEGY

REGULATION 12 AND 13 CONSULTATION STATEMENT

1. Introduction

- 1.1 This Statement has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012, and having regard to the requirements of the National Planning Policy Framework (2012).
- 1.2 This Statement addresses the requirements of Regulations 12 and 13 of the Town and Country Planning (Local Development) (England) Regulations. It outlines how consultation was undertaken by the Council, sets out who was consulted, and provides a summary of main issues raised and how have been addressed in the Manor Royal Design Guide Supplementary Planning Document (SPD). The consultation has also been undertaken in accordance with the procedures outlined in Crawley Borough Council's adopted Statement of Community Involvement (December 2011).

2. Document Evolution

- 2.1 The Manor Royal Design Guide Supplementary Planning Document was adopted by Crawley Borough Council at the 10 July 2013 Cabinet Meeting. An accompanying Public Realm Strategy was adopted at the same meeting. The following section provides full detail of the consultation process that has helped shape the final documents.
- 2.2 In accordance with the Regulations, the draft Manor Royal Design Guide and Public Realm Strategy was published for a four-week period of public consultation from 14 January until 14 February 2013. The intention of this document was to enhance the setting and appearance of the Manor Royal environment through establishing a series of design principles to guide development.
- 2.3 Although the intention to improve the Manor Royal environment was broadly supported at consultation, some respondents expressed concern relating to some of the more detailed approaches put forward by the document. In response to feedback received during this consultation period, the council adapted and amended the original consultation document to produce two separate but complementary documents to help shape the future appearance of Manor Royal.
- 2.4 The first of these is the Manor Royal Design Guide SPD. This recognises that good design is a key requirement of the National Planning Policy Framework, and sets out guidance to outline what the council considers to represent good

design in Manor Royal. The SPD will be used when new developments are proposed, but also relates to extensions and alterations, to provide design guidelines around landscaping, site layout considerations and the value of improving 'gateway' sites.

- 2.5 The Manor Royal Design Guide SPD is complemented by a Public Realm Strategy. This is a non-statutory companion document to the SPD, which suggests possible approaches and opportunities through which improvements to the overall environment of Manor Royal could be delivered.
- 2.6 Both draft documents were subject to a further two-week consultation period, during which respondents and interested parties were invited to provide additional feedback on the amended documents. Feedback from both stages of consultation has fed into the final documents, and all comments have been included in the report presented to the council's Cabinet meeting on 10 July, where both documents were adopted.

3. Consultation Undertaken

- 3.1 As mentioned under section 2.1, public consultation was undertaken on the draft Manor Royal Design Guide and Public Realm Strategy over a four-week period from 14 January until 14 February 2013. Following feedback received at consultation, the document was amended to form the Manor Royal Design Guide SPD and accompanying Public Realm Strategy. Both documents were then published for a further two-week consultation period held from 30 April until 13 May 2013.
- 3.2 For the initial consultation period, emails or letters were sent to statutory consultees including utility companies, emergency services and neighbouring councils. All properties and businesses within or adjacent to Manor Royal, were also consulted, as were key landowners and their representatives. Consultation information was also sent to residential properties adjacent to Manor Royal, comprising: 191-207 Martyrs Avenue (odd numbers), Birch Lea, Dalewood Gardens, Harewood Close; Kenmara Close, Glenview Close, Green Lane, Redwood Close, Royston Close, Tinsley Lane, Summersvere Close, Tushmore Lane, and Tuscany Gardens. In total, over 1,400 individual properties were consulted.
- 3.3 The same approach was undertaken for the second consultation, with the exception that residential properties bordering Manor Royal were not this time consulted. This approach was felt to be appropriate as the council did not receive any comments from residents at the initial consultation stage, and on the basis that the revisions made to documents would not affect the Manor Royal boundaries or materially affect the surrounding residential properties. As such, follow-up letters/emails were sent to 1,100 properties.
- 3.4 Details of all properties and individuals contacted for both consultation periods are available upon request.
- 3.5 For both consultation periods, information about the consultation and consultation documents were published on the council's website and the Manor Royal

Business District website. Paper copies of the documents were available to view in Crawley Town Hall, and Crawley and Broadfield Libraries.

- 3.6 Press notices to publicise the consultation periods were published in the Crawley Observer during the weeks commencing 14 January 2013 and 6 May 2013. Press releases were also issued prior to each consultation period, and also in between consultations to ensure interested parties were kept informed. Articles were also published via the Manor Royal Business Group Linked-In forum to publicise the January 2013 consultation, the March 2013 edition of the Manor Royal Newsletter and through the to ensure that the business community was aware of the opportunity to comment of the documents.
- 3.7 Regular emails were sent to all respondents in between consultation periods to ensure that interested parties remained informed of the latest developments.

4. Consultation Feedback

- 4.1 A total of 12 detailed responses were received in relation to the initial consultation held in January and February 2013. A summary of all comments made, and the council's response to these, is attached below as Appendix A.
- 4.2 A further 10 responses were received in relation to the additional consultation period held in April and May 2013. A summary of all comments made in relation to both the Manor Royal Design Guide SPD and Public Realm Strategy, as well as the council's response to them is attached below as Appendix B.

APPENDIX A

First stage of consultation for combined SPD & Public Realm Strategy

- In line with national SPD regulations, in January 2013 a 4 week consultation period was undertaken.
- Statutory press releases and notices went out in the local papers and on the council website including links to the documents
- A news item was published on the Manor Royal Webpage and included in the newsletter to all businesses in the District.
- A letter was sent to all residential properties adjacent to the Business District in Three Bridges, Northgate and Langley Green.
- Over 1100 letters were also sent to Businesses, landowners and agents including those that made representations to the Adopted Development Principle Statements (DPS's) on key gateways sites.
- Paper copies were put in reception and two local libraries and the members room

Respondent	Summary of Representation	Council Response
Barton Wilmore (SEGRO)	<p>SEGRO owns a site on the Manor Royal Estate on the corner of London Road and Fleming Way, and has been exploring redevelopment proposals to bring the site forward in the near future. Whilst SEGRO supports the establishment of a series of design principles in order to ensure that the estate is attractive to potential occupiers, it is crucial that this is balanced with ensuring that policy is not too prescriptive and detrimental to potential development opportunities.</p> <p><u>Introduction</u></p> <p>Sections 1.3-1.5 clearly recognise the challenges at Manor Royal in terms of vacant buildings, but seek restrictive design principles as a solution, which could in fact stifle development and worsen the situation. Clearly a balance needs to be struck. It is essential that a balance is struck between design principles and economic growth at Manor Royal. The significance of defined development zones, particularly the key development sites, is identified in section 1.6.5, but it must be recognised that these sites have remained vacant for a number of years and that a proactive approach to development is essential to promote growth. It would be appropriate to introduce public realm and design principles at the design stage, but the principal priority</p>	<p>Noted</p> <p>Noted. The Council approach is to ensure that the previous approach to restricting uses has been amended to align with the NPPF and alongside the emerging Local Plan 2029 policies.</p> <p>By allowing a flexible and pragmatic approach to land uses, in line with the NPPF and emerging local plan policy, the design and landscaping elements are introduced to ensure</p>

<p>Barton Wilmore (SEGRO)</p>	<p>must be to promote occupation and growth at these sites. As such, some flexibility should be acknowledged in the text.</p> <p><u>Landscape</u></p> <p>Section 2.3 includes a Landscape Structure Plan, which highlights the primary and secondary road tree structures and supporting colour strategy. This level of detail is far too prescriptive, and while the Council may suggest such a scheme as part of a non-statutory document, inclusion in the SPD is inappropriate. The policy could only apply to redevelopment proposals and not in relation to any temporary facilities prior to redevelopment.</p> <p><u>Car Parking</u></p> <p>Section 2.4 of the SPD sets out that substantial landscape schemes should be provided aimed at reducing the visual intrusion of large areas of on-plot parking, setting out a number of factors that should be considered in development. It is not considered appropriate to require that such extensive landscaping is incorporated within car parking schemes, and schemes should be dealt with on a case by case basis. Therefore, use of the wording “should be considered” is appropriate provided that the Council do not later interpret this as a “fixed requirement”. Principles should only apply to</p>	<p>that developers can be clear of the council’s key considerations for the site, whilst remaining flexible over land uses. The revised SPD, amended in light of these comments, details all elements to be considered in regard to general design principles and site specific design principles. By separating these principles from the Public realm Strategy, all opportunities within the public realm to improve the aesthetic of the business district ensure that both documents set out future aspirations within both the private and public realm.</p> <p>Noted. By separating the SPD requirements from the Public Realm Strategy, those landscaping opportunities within the public realm, such as those illustrated by the landscape structure plan, are identified. It is not the intention that the landscape structure plan defines the approach or species within private plot frontages. However, it does not preclude the use of the specified species where appropriate.</p> <p>Landscaping can significantly reduce the visual impact of large areas of car parking. Successful design and layout considerations can ensure that the two elements are complementary and that car parking does not dominate site frontages. Pre-application discussions to consider the specifics of individual sites will be encouraged, this also relates to any temporary uses.</p>
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<p>Barton Wilmore (SEGRO)</p>	<p>redevelopment proposals and not in relation to any temporary facilities prior to redevelopment.</p> <p><u>Advertising and Signage</u></p> <p>Section 2.5 sets out that signage should not contribute to visual clutter. It is important that this principle is balanced with the practical operation of businesses at Manor Royal and does not prevent businesses from being sufficiently sign-posted.</p> <p><u>Boundaries</u></p> <p>Section 2.6, and in particular paragraph 2.6.3 requires all new developments on key frontages to use where appropriate an indigenous hedgerow, with no security style fencing permitted at the back of public pavements. This wording is too prescriptive, and goes beyond the scope of a SPD, potentially deterring future occupiers. It should be revised to state that security style fencing should be designed carefully where appropriate and should have regard to the adjacent plots, particularly where development has already occurred.</p> <p><u>Lighting</u></p> <p>Section 2.7 includes design principles for lighting and sets out that lighting should be used sparingly and with care to avoid unnecessary security lighting. It is important that this design principle is not at the jeopardy of the security, functionality and branding of businesses at Manor Royal.</p> <p><u>Highways Signage and Wayfinding</u></p> <p>SEGRO supports the objective set out in Section 2.8 to provide clear and consistent signage directing towards “Manor Royal Business District”, in helping to navigate drivers and strengthening “Manor Royal Business District” as a brand identity.</p>	<p>Noted. The SPD aims to highlight the current problems and issues that occur with proliferation of mixed signage. It asks for consideration of appropriate levels but this does not mean that sufficient signage is inappropriate. Consideration will be given on a site by site basis.</p> <p>Noted. Section 2.6 has been altered to allow the approach to be considered having regard to the specific needs of each individual plot.</p> <p>Noted. It is not the intention of the SPD to undermine security lighting, nor to be overly prescriptive. Given the restrictions arising from proximity to the airport, CAA requirements regarding lighting have also been added.</p> <p>Noted.</p>
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<p>Barton Wilmore (SEGRO)</p>	<p><u>Cycleways and Provision for Cyclists</u></p> <p>The objective in Section 2.9 to extend the existing network to improve permeability and increase options for sustainable travel is supported, provided that this is in dialogue with existing businesses to ensure that what is proposed is in line with occupier needs and does not encroach onto development sites.</p> <p><u>Development Principle Statement Sites</u></p> <p>Section 3.4 of the SPD sets out design principles in relation to site D4 SEGRO West, London Road, and repeats the specific design principles as set out in the SEGRO West Design Principles Statement (2012). SEGRO is concerned that identified landscaping requirements could be overly prescriptive in the absence of detailed design, and could place an undue restriction on the developer, potentially hindering development. Of more concern, is the fact that such a depth of landscaping of 10 metres will reduce site coverage. This could affect the commercial viability of the site and could render the site unviable to developers.</p>	<p>Noted. The provision of cycle lanes is shown on the cycle network map within the public realm but would require development to consider improving any access or promotion of routes within any travel plans or design and access statements.</p> <p>The amended SPD aims to focus on improving the aesthetic of the Business District, and in particular strengthening the role and contribution of structural and site boundary landscaping. The amended version identifies why each development site will be required to fulfil its particular landscaping and building set back. This is based on site specific characteristics such as carriageway width, contribution of highway verge, depth of plot, and relationship with adjacent sites. Officers have reassessed the DPS requirements, and in this case the provision of 10 metres of landscaping is considered appropriate. However, officers have amended other elements of design and set-back, as set out in the DPS, to allow flexibility regarding site coverage. The SPD will replace the DPS for the site.</p>
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<p>Barton Wilmore (SEGRO)</p>	<p>Although the Council's aspiration for high quality development on this site is supported there is concern that the term 'landmark building' is not clearly defined, particularly the exact location. A development that has to hug the roundabout corner creates layout and circulation difficulties, and could serve to stifle development if it remains this prescriptive. It should also be clarified that whilst the SPD seeks high design standards at key gateway sites and frontages, 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. To maintain a flexible approach we strongly suggest that wording is revised to emphasise that proposals should seek to meet these design requirements, but not as a definitive development standard.</p> <p><u>Gateways (3)</u></p> <p>Section 4.5 identifies SEGRO's site as Gateway 3: London Road/ Fleming Way (Proposal G3). The Proposed G3 Design Principles Plan includes private plot landscape significant boulevard trees and frontage hard landscape significant boulevard trees to support the public realm. Proposal G3 also includes public realm proposals and a soft materials palette setting out the tree and shrub planting and feature work which design should be centred on at Gateway 3. We suggest a caveat is added clarifying that these design principles will be required where viable and deliverable, to ensure that developers are not bound to unviable or undeliverable requirements that could hinder the deliverability of development. These design principles will increase costs and potentially reduce site coverage which will adversely affect commercial attractiveness, stifling development on this key gateway site.</p> <p><u>Primary Roads – Fleming Way and London Road</u></p> <p>Primary Road Proposals for Fleming Way (PR2) and London Road (PR3) in Section 5.4 and 5.5 include detailed design elements. It is considered that</p>	<p>The term landmark utilises the terminology from the adopted DPS. The term requires careful consideration of the design and building orientation on the gateway and key opportunity sites, particularly given that it sits on the main interchange with both London Road and Fleming way which are primary road frontages. The term does not restrict land use, and does allow for flexibility providing the proposed building reflect the status and importance of this site at this prominent gateway. The objective of delivering a landmark building can be provided through a mix of uses and/or a range of design principles, and the term does not solely relate to the provision of offices.</p> <p>Noted. By separating the design principles for the site in the SPD, from wider aspirations considered within the Public Realm Strategy, the level of detail relating to planting etc. has been removed. In line with the NPPF all development must be deliverable and viable and therefore applicants are encouraged to discuss site specific issues at a pre-application stage, based on a case by case basis.</p> <p>Agreed. The creation of two separate documents aims to clarify the position between</p>
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<p>Barton Wilmore (SEGRO)</p>	<p>this level of detail in relation to the design of the primary road network and the public realm goes beyond scope of SPD. We strongly suggest that guidance should avoid being too prescriptive, and that the tone and wording is changed to be explicit that these elements will be sought where appropriate and viable. SEGRO support the proposals for Fleming Way and London Road in Section 5.4 and 5.5. However, it is not clear how the proposed improvements and long term maintenance will be funded and if the cost would fall to developers/occupiers or as suggested in Section 8, a range of funding opportunities.</p> <p><u>Delivery</u></p> <p>Support Section 8.2.2, which sets out that in addition to Council allocated funding, other funding opportunities for the delivery of the other public realm works could come from development and other channels, as clearly it would be onerous for developers to fund the delivery of all public realm works.</p> <p><u>Conclusion</u></p> <p>As demonstrated by the Thales scheme on London Road, which is recognised as a successful scheme within the emerging SPD, SEGRO is committed to good quality design. SEGRO supports the role of the SPD in encouraging good design, but would urge the Council to remove the prescriptive design considerations from the document and instead seek to provide guidance on design themes, and emphasise the importance of viability in delivering schemes. In general the policy requirements and supporting text are unnecessarily prescriptive. As set out under Paragraph 21 of the NPPF (2012) investment in business should not be over-burdened by the combined requirements of planning policy expectations. In its current state the SPD is not considered to be in line with Paragraphs 21 or 173 of the NPPF. SEGRO would urge CBC to think more flexibly about design principles across Manor Royal, so that opportunities for development which are supported by market demand are delivered. The alternative is to see sites remain under utilised and vacant for an indefinite period.</p>	<p>development requirements and public realm aspirations. As such, the revised SPD requires a policy framework to ensure a balance between design guide requirements and wider public realm aspirations.</p> <p>Noted.</p> <p>It is recognised that in light of the NPPF any Design Guidance SPD should not be overly prescriptive. However, the NPPF also requires local authorities to provide clarity to developers regarding local circumstance that may inform and define good design principles. The provision of the SPD and supporting Public Realm Strategy allow CBC to identify clear good design principles and proposals to address how improvements to the local environment may be considered. The provision of the two documents is therefore considered to be NPPF compliant and is supportive of identifying design solutions through partnership working.</p>
<p>Civil Aviation Authority</p>	<p>The CAA does not wish to comment on this document</p>	<p>Noted</p>

<p>Environment Agency</p>	<p><u>Biodiversity</u></p> <p>There is no baseline ecological appraisal of the retained areas of greenspace in the development included in the document. A more detailed assessment would help to guide policy and guidelines to ensure that the integrity of the ecological network and green corridors are enhanced by outline proposals and design guidance. It is important that this is done and incorporated into the design guide before policy or decisions are made that would negatively impact on the existing areas for wildlife.</p> <p>We are supportive of the aspiration to generally enhance the ecological and aesthetic appeal of the green corridor formed by the Crawters Brook and other green space in Manor Royal. However it is essential that the design guide improves upon the current proposals for the watercourse and surrounding habitats where it exists. New proposals would be expected to protect and improve upon the existing ecology of the watercourse and any surrounding habitat. Redevelopment proposals must demonstrate how they will deliver a net gain your biodiversity.</p> <p>The condition of Crawters brook is currently designated as 'Bad' in Water Framework Directive terms. Any proposals on, adjacent to or which would indirectly impact on the watercourse must work towards improving the ecology and water quality of the brook; and not prevent any future measures that are required as mitigation measures. Site specific guidance has been provided to this effect.</p> <p>This may include but is not limited to:</p>	<p>In defining the Masterplan, detailed assessments of the opportunities available to improve biodiversity and greening the environment have been fully considered. The aspirations of both the SPD and the Public Realm Strategy appreciates that further work will be required to ensure that any physical development will consider in full its impact in biodiversity terms to ensure that it does not negatively impact on the local environment. The use of green infrastructure, wildlife and green corridors, and mitigation such as SuDs will need to be considered as part of any detailed development proposals or improvements projects.</p> <p>Noted. Proposals to improve local watercourses, including the environs of Crawters Brook, will be considered further as site-specific proposals are developed. Also, additional wording has been added to the revised SPD.</p> <p>Proposals to improve Crawters Brook will be considered further as site-specific proposals are developed. It is intended that this issue will also be addressed through emerging local plan policy.</p>
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<p>Environment Agency</p>	<ul style="list-style-type: none"> • Restoring more natural morphology and character to the watercourse where this has been lost, such as through restoring bed material, natural banks, diverse in-channel features, marginal and buffer zone habitat such as trees, grassland and wetland habitats; • Limiting the number of new outfalls and infrastructure that reduces the amount of river habitat; for example including multiple SuDs schemes within the development area, but limiting the drainage links to the watercourse corridor; • There is a lack of <i>strategic</i> consideration for SuDs in the guidance for redeveloping the site, which would improve water quality and reduce flood risk, and in so doing improve the ecological and amenity value of the corridor. Rather than promotion of piecemeal improvements to drainage, the strategy should more closely consider the scale and location of improvements to the whole area, which will lead to the necessary improvements in the watercourse; • Prevent the intrusion of lighting into the watercourse corridor that would disrupt and disturb wildlife; • Ensure the design does not encourage disturbance to the corridor that would lead to an increase in public nuisance such as litter, or damage to wildlife habitats; and • As it stands the Crawler's brook has plenty of potential to increase the buffer to the brook in future re-developments, this should be strongly emphasised. <p><u>Flood Risk</u></p> <p>We are broadly in agreement with the approach, though there is a lack of consideration given to reducing surface water runoff (i.e. SuDS or alternative) which would lead to water quality improvements in the Crawters Brook. There needs to be information relating to any redevelopments within the flood zones and the aim to reduce the risk of flooding in line with national policy. Detailed information relating to what information would need to be provided by potential developers would also be useful.</p>	<p>Noted. The amended SPD will make reference to the council's local list, and in particular the requirement that development proposals reflect the approach and recommendation set out within the Crawley SFRA.</p>
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<p>Environment Agency</p>	<p><u>Groundwater Protection</u></p> <p>There is a lot of emphasis on making car parks more visually appealing by encouraging the use of swales and other SuDS methods. It should be noted that all of Manor Royal sits on Weald Clay, which does not allow for much infiltration, and alternative methods may have to be considered. Surface water drainage for the buildings themselves should be included in any design statements. It should be noted that infiltration is not permitted into land impacted by contamination.</p> <p><u>Green roofs and Water Efficiency</u></p> <p>We note and support the approach for encouraging green roofs and walls within design, these can help contribute towards not only extending wildlife corridors but also aid with reducing surface water runoff. There does not appear to be any mention of water efficiency measures to be designed into buildings. As you are aware water is a precious resource and the south east is water stressed. Therefore we would strongly advise the inclusion of water efficiency devices/schemes within this SPD to help reduce the amount of water used unnecessarily.</p>	<p>Noted. This SPD will sit alongside emerging local plan policies and existing SPGs. The council is also intending to develop an additional SPD relating to sustainable development.</p> <p>Noted. Wording added to the new SPD.</p>
<p>Gatwick Airport Limited</p>	<p>We are pleased to see that aerodrome safeguarded has been included in the document.</p> <p><u>New Developments & Alterations 2.2.3</u></p> <p>We would ask that under the first paragraph relating to building heights and safeguarding requirements of Gatwick Airport, that height restrictions for cranes and other construction equipment is also mentioned. Cranes would also need a permit from the airport. Further details can be found in AOA Advice Note 4 'Cranes & Other Construction Issues'</p> <p><u>Further References 2.2.5 – Summary of CAA Requirements</u></p> <p>Please note that CAP680 'Birdstrike Risk Management' is now CAP772.</p>	<p>Noted Wording added to the new SPD.</p> <p>Wording added to the new SPD. CAP ref removed.</p>

<p>Gatwick Airport Limited</p>	<p>Advice Note 3 is predominantly an AOA advice note and can be found on the AOA website at www.aoa.org.uk/policy-safeguarding.htm. With regard to the birdstrike/landscaping advice in the summary of CAA requirements, for clarity, we are suggest that it could go under para 2.3.2 which also mentions CAA requirements and landscaping. CAP 738 'Safeguarding of Aerodromes' mainly relates to the safeguarding process itself, with only a few lines on bird hazard management. We suggest that it may be better just to quote the CAA website address (which you have done), should people wish to do further reading, rather than mentioning specific CAPS.</p> <p>The AOA advice notes are very informative and make 'lighter' reading, than the CAPS and are available on the AOA website at www.aoa.org.uk/policysafeguarding.htm</p> <p>Each development needs to be assessed individually on its proposals and its proximity to the airport/radar. We are always willing to engage with developers and yourselves with regard to aerodrome safeguarding advice in relation to proposed developments. We would be happy if you wish to add that if aerodrome safeguarding advice is required please contact the Gatwick Safeguarding Officer on gal.safeguarding@gatwickairport.com</p> <p>For information: We would not wish to see large expanses of green roof close to the airport as they are very attractive to birds (particularly gulls) for nesting, roosting and loafing.</p> <p><u>Lighting – Para 2.7</u></p> <p>We would ask that mention is made that lighting schemes need to be designed in such a way so that pilots are not distracted or dazzled, and to ensure that any lighting does not replicate or distract from aeronautical lighting. Further advice can be found in AOA advice note 2 'Lighting Near Aerodromes' available at www.aoa.org.uk/policy-safeguarding.htm</p>	<p>Noted. Ref added.</p> <p>Noted. Ref added.</p>
<p>Gatwick Airport Limited</p>	<p><u>Future Airport Boundary</u></p>	<p>Noted. The SPD refers developers to consider</p>

	<p>Please note that some of the areas included in the supplementary document are located within the future airport boundary as shown on Crawley Borough Councils 'Local Development Framework Proposals Map' as 'Gatwick Safeguarding (Core Strategy G2). The general areas are:</p> <ul style="list-style-type: none"> Land North of Cobham Way and East of Gatwick Road Land off Beehive Ring Road County Oak Cottage/Amberley Court, Whitworth Road Land South and West of James Watt Way <p>GAL will object to any 'non minor' developments proposed within the 'Gatwick Safeguarding Area'.</p> <p><u>Renewable Energy</u></p> <p>Although there is no specific mention of renewable energy at present in the document, we feel it is worth mentioning that wind turbines can cause potential issues with radar and if any turbines were proposed, early consultation with the airport is recommended to enable us to assess any potential issues. Further advice can be found in AOA advice note 7 'Wind Turbines & Aviation' available at www.aoa.org.uk/policysafeguarding.htm. Large areas of photo voltaic panels have the potential to distort radar and should large areas be proposed, early consultation with the airport is recommended.</p>	<p>all constraints and opportunities as set out in the adopted Core Strategy and emerging Local Plan policies. The revised SPD also recommends early pre-application discussion with regard to the site-specific implications arising from Gatwick Airport.</p> <p>Noted. And refs added.</p>
Highways Agency	We do not wish to make any comments on this document, but would like to continue to be consulted as you develop your LDF.	Noted.
Horsham District Council	<p>Horsham District Council recognise that the Manor Royal Business District is a key economic hub within the south-east economic sub-region. Guiding development on this site presents a key opportunity for employment growth, intensification and expansion of activity to support the economic needs of the sub-regional area.</p> <p>As an authority within the Gatwick Diamond, Horsham are supportive of any plans which will reinforce the area as a leading sub-regional employment destination. The measures proposed in the SPD will increase the prominence of the Gatwick Diamond as an area for economic investment</p>	<p>Noted</p> <p>Noted.</p>

<p>Horsham District Council</p>	<p>and HDC will be pleased to work closely with CBC to support this.</p> <p>HDC are pleased to note the proposals to improve highways signage and wayfinding from the A23. It is important to raise the profile of the Manor Royal Business District, specifically in relation to Gatwick and the wider Diamond area. A suggestion could be to re-brand the business park as the 'Gatwick Diamond Manor Royal', emphasizing the point it is part of a much wider economic area. If all business locations within the Gatwick Diamond were to re-brand in the same way, it would create a strong and wide ranging brand image for the sub-regional area. A secondary point could be to consider the use of the Manor Royal logo on the highways signage as this would again promote a strong brand image and the identity of the area as a key business district.</p> <p>HDC fully support Section 2.9 regarding the provision of cycleways as a means of improving options for sustainable travel. Consideration may also be given to setting a requirement for adequate cycle change facilities in each new development and extension, as this could again encourage a modal shift towards more sustainable transport options.</p> <p>It is also noted that the proposed planned growth at Manor Royal, could have implications for our District therefore we ask to be closely informed of any development proposals in this location.</p>	<p>Noted. Suggestion has been forwarded on to Crawley Borough Council Economic Development for response.</p> <p>Noted.</p> <p>Noted.</p>
<p>Jones Lang LaSalle (on behalf of Thales)</p>	<p>Jones Lang LaSalle appreciate being allowed to respond to consultation beyond the deadline though are concerned that notification of the consultation was not received by ourselves or Thales. It is understood that the significant changes have now been made to the document, and Thales formally requests that an additional consultation on the revised document should be undertaken.</p> <p>Thales supports the council's aspirations to attract further investment into Manor Royal, though is concerned about an overly prescriptive policy framework in respect of its site at Gatwick Road. This could potentially blight</p>	<p>Noted. Database checked accordingly and notification had been sent direct to contacts at both Thales and Jones Lang LaSalle as planning agent. However, following the completion of consultation detailed discussions have been on-going to rectify the situation and full opportunity has now been afforded to both parties to participate in both stages of consultation.</p> <p>Noted. The amendments made to the revised SPD aim to clarify site-specific requirements and justify the councils approach. The SPD</p>

<p>Jones Lang LaSalle (on behalf of Thales)</p>	<p>the site for years to come, potentially hampering its ability to make future investments into its business, including at Manor Royal. Therefore, any policy framework for the site needs to be flexible, and whilst it can aim to promote high quality development, it must allow for a range of employment and/or complementary uses on the site.</p> <p>Evidence has previously been submitted in relation to issues that Thales needs the council's help to overcome, though this does not appear to have been considered. These expressed particular concern regarding the potential allocation of the site for business use alone, which is seen as overly prescriptive and inflexible; expressed concern regarding undue weight being applied to the Manor Royal Masterplan; outlined concern regarding a requirement that the site fund recreational improvements at Crawters Brook; design concern regarding the requirement for a 'landmark building', and regarding proposals for 10-20 metre landscape buffer zones.</p> <p>Prescriptive policy guidance allocating the site for business use (under Site D2) is strongly objected to and reference should be removed. Such a narrow scope of uses is contrary to the NPPF, which does not support such designations where there is no reasonable prospect that they will be brought forward for the intended use.</p> <p>Paragraph 1.3.2 (and others) state that the private sector will be relied upon to bring forward changes at Manor Royal. In the difficult economic climate there is risk that if onerous Section 106 contributions or other levy's such as CIL are imposed to implement the SPD requirements, this is likely to blight sites from coming forward due to viability issues.</p>	<p>considers the parameters set by the DPS and aims to simplify the policy approach by replacing the DPS guidance within the SPD.</p> <p>The SPD now considers a more flexible approach to land use in line with the NPPF and emerging local plan policies. The SPD also has reconsidered any requirements regarding design and landscaping, and the revised document is considered to be NPPF compliant. The approach to this key site is considered to be more flexible given dialogue with owners and agents, and is felt to reflect a more pragmatic approach to site delivery.</p> <p>Noted. The SPD has been amended to remove reference to specific use types, and recognises that a range of typologies may be appropriate provided that proposals comply with both the NPPF and relevant policies within the Core Strategy and emerging local plan.</p> <p>Noted. The SPD now clarifies all improvements within the private realm to be provided as part of the development, and all external public realm improvements to be provided through partnership working. The council is currently considering the relationship between Section 106 and CIL and current S106 requirements are expected to be</p>
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<p>Jones Lang LaSalle (on behalf of Thales)</p>	<p>The council states that if it owned more land at Manor Royal then its design aspirations could be implemented. More information regarding the funding available would be helpful to existing landowners/occupiers at Manor Royal so they can help the council ensure it is spent where it is most needed.</p> <p>Paragraph 1.5.1 states that the NPPF requires Local Authorities to assist in building a strong, competitive economy, and should not over burden investors with policy expectations. There is concern that both the Manor Royal SPD and Design Principles Statement are overly prescriptive in providing a raft of policy and design guidance that place restrictions in terms on the type size, location, and form of any development on the Gatwick Road site. The guidance already restricts most types of employment development from being accommodated on site even though the previous use was a mix of B1/B2/B8. We have provided evidence showing there to be no demand for offices in this location, and are concerned that if adopted in its current form, the SPD could prevent the site from coming forward for development. Greater flexibility is therefore required. The SPD should clearly state that alternative uses (to the business allocation) should be assessed on their merits against prevalent National and Local plan policies.</p> <p>Paragraph 1.6.23 refers to certain types of retail development being restricted on the site. This reference is not needed, and could deter potential developers and/or occupiers from coming forward who may be able to promote high quality retail or quasi retail uses.</p>	<p>superseded by CIL requirements.</p> <p>Public realm improvements within the strategy do not currently have funding streams allocated, and engagement with land owners and stakeholders will be undertaken as part of any improvement proposals.</p> <p>It is recognised that in light of the NPPF any Design Guidance SPD should not be overly prescriptive. The revised SPD now allows a more flexible and pragmatic approach to land uses, in line with the NPPF and emerging local plan policy. The design and landscaping elements are introduced to ensure that developers can be clear of the council's key considerations for the site, whilst remaining flexible over land uses. The revised SPD, amended in light of previous comments, details all elements to be considered in regard to general design principles and site specific design principles based on site specific considerations and constraints in line with the NPPF.</p> <p>The revised SPD reflects the town centre first principles of the NPPF and the adopted Core Strategy and emerging local plan. Therefore, as recognised in the NPPF, the onus will be on developers to demonstrate that proposals are acceptable having regard to the sequential assessment and in retail impact terms.</p>
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<p>Jones Lang LaSalle (on behalf of Thales)</p>	<p>The design guidance provided at 7.3 in relation to Crawter's Brook is very prescriptive and further information in relation to the feasibility of the council's funding allocation to show how any of the improvements would be paid for would be welcomed. If it is solely the responsibility of any development at Gatwick Road to find the council's aspirations, then it is likely the cost of doing so will prevent the site from being developed.</p> <p>The requirement for a checklist to assist the SPD (set out in paragraph 8.2.3) should be removed as there is already a raft of guidance. This is prescriptive and confusing, and is likely to hinder development.</p>	<p>Noted. By separating the SPD design requirements from the Public Realm Strategy aspirations, the relationship between the open space and the development site adjacent has been clarified. It is not intended that all possible opportunities to open up Crawters Brook should be funded and implemented as part of the development. However, any proposals should demonstrate how they have considered the relationship with the adjacent open space in its design, environmental impact, and enhancement of ecological and leisure opportunities</p> <p>Noted. The requirement for a checklist was being considered to assist in pre-application discussion, but has now been removed.,</p>
<p>Natural England</p>	<p>Natural England does not consider that this document poses any likely or significant risk to the natural environment. The SPD clearly promotes an improvement to the environment of Manor Royal, which includes, <i>inter alia</i>, biodiversity and green infrastructure enhancements, greening the built environment, sustainable transport routes, sensitive lighting and considerations on managing and maintaining Crawter's Brook; all of which we welcome, We only advise that the SPD seeks to protect the ecological interest features on site, and does not impact the features of nearby Local Wildlife Sites or Ancient Woodlands.</p>	<p>Noted.</p>
<p>Rapleys LLP</p>	<p>My client is freeholder of the former County Oak Business Centre site at Betts Way, which benefits from planning permission CR/2010/0033/FUL for a Class A1 retail store, which has been implemented.</p> <p><u>Paragraph 1.6.23</u></p> <p>It is understood that the intention of the document is not to control the principle of land use. However, the last sentence of paragraph 1.6.23 states</p>	<p>Draft Policy EC6 is taken from the emerging local plan 2029 and wording is currently being considered as part of the submissions stage</p>

<p>Rapleys LLP</p>	<p><i>“it is not the intention of the SPD to be overly restricting any uses classes spatially, beyond policy EC6 requirements that limit retail and residential uses”</i>. We do not object to the reference to Policy EC6, if it solely relates to the “character areas” as defined as Character Areas A, B and C on the Character Area Plan. The sentence should be clarified such that that the reference to Policy EC6 applies to those character areas only. However, if it is intended to apply to the wider Manor Royal area we consider it inappropriate, particularly in the context of the planning permission for retail use granted on my client’s site. If that is the intention, we object to the reference to Policy EC6 in this paragraph.</p> <p><u>Paragraph 1.6.26 and general design guidance</u></p> <p>This advises that any development outside the defined character areas should refer to general design guidance at section 2. Any design principles cannot override, nor should they, the terms of the planning permission already granted for my client’s site, and the approved scheme should be acknowledged as applying appropriate design principles.</p> <p><u>Development Area D5 Betts Way</u></p> <p>The SPD notes that the D5 site is a major development site identified in the Manor Royal Masterplan (2010). However its extent and boundary as shown</p>	<p>later this year. The restrictions relating to retail and residential as set out within the SPD do relate to all of Manor Royal, including areas outside those specified character areas. The revised SPD reflects the town centre first principles of the NPPF and the adopted Core Strategy and emerging local plan. Therefore, as recognised in the NPPF, the onus will be on developers to demonstrate that proposals are acceptable having regard to the sequential assessment and in retail impact terms. With regards to residential uses, whilst the council recognises the need for sustainable housing delivery, it is considered that Crawley has significant local circumstance that warrant protection in Manor Royal that would further restrict residential uses and any future permitted development changes This is based on the scarcity of available land, and recognising the fundamental sub-regional employment function of Manor Royal and its relationship with Gatwick Airport.</p> <p>Noted. It is recognised that there is permission for retail on this site. However, general design principles for the whole of the area would be a material consideration in the event that any other application(s) were to be submitted.</p> <p>Noted. The site as set out within the SPD is an amalgamation of the 2 sites and details will be checked and amended. The SPD has been amended to recognise that retail consent and office consent has been granted.</p>
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<p>Rapleys LLP</p>	<p>on the plan is incorrect and is inconsistent with its legal ownership and title. More particularly, the extent of the former Premier House site, as identified in the Masterplan, extends erroneously to include an area of land which overlays my client's ownership, being the subject matter of the approved retail scheme (CR/2012/0033/FUL). For the avoidance of doubt, the extent and boundary of the D5/former Premier House site should be amended to explicitly reflect its legal ownership and title, as per the application site boundary applying for the now lapsed consent for a new office building (reference CR/2008/0022/FUL). A clear distinction of the site ownership is important, particularly as the approved retail scheme on my clients site has been approved as an appropriate design solution at this particular locality, including in visual amenity terms. The analysis of D5 should reflect this factual position.</p> <p><u>Detailed Design Guidance – Area Improvement Zone</u></p> <p>The boundary of the Betts Way DPS is identified as an Area Improvement Zone on the Strategy Plan. However, the supporting paragraphs do not clarify the intent for such a zone, nor does the Plan recognize the consent granted and implemented on our client's site. For us to comment on the intent of the Area Improvement Zone properly, clarification is requested. If it means that the zone relates to the areas subject of the Development Principle Statements, then to avoid confusion, the key should be amended accordingly.</p> <p><u>Conclusion</u></p> <p>It is acknowledged that the SPD seeks to provide design guidance for development proposals in Manor Royal regardless of the land use concerned, with more detailed design principles set out for defined character areas and development sites. However, the SPD, as currently drafted, does not distinguish my client's site from the adjacent development site (i.e. the former Premier House site) nor does it recognize the fact that it benefits from a retail consent, which should be taken into account in the analysis of design principles for the area, and as material considerations in the assessment of any potential subsequent scheme revisions.</p>	<p>Noted. This has been deleted from the maps as it was not explained.</p> <p>The revised SPD identifies existing planning consents. However, design guidance is provided for Site D5 and its wider environs to recognises the value of the gateway as an entrance/exist to Manor Royal. The revised SPD and any existing permissions will represent a material consideration in the event that any future applications are submitted for this site.</p>
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<p>Thales</p>	<ul style="list-style-type: none"> - What degree of funding is available from the council to redevelop Crawters Brook? - Over what period will this funding be provided? - Is any contribution expected from occupants of Manor Royal (existing or future occupiers) or other local rate payers? If so, what levels of contribution will apply and how would this be collected? - What is the estimated cost for redeveloping Crawters Brook – in total and broken down by each of the proposed phases? - Why is the redevelopment of Crawters Brook seen as a greater priority than other pressing needs, particularly in the current economic climate. This site has been in the council's ownership for some time, but has not been delivered. We have been present in sites adjacent to Crawters Brook for many years, and are not aware of the presence of bats or deers and do not understand why these are mentioned in the draft SPD. <p>Thales object to the definition of its site as a 'development site' or 'key site' – whilst under normal circumstances one could expect benefits from sites being so designated, in this case the constraints and potential costs of aspirations associated with this new definition makes development unviable and unrealistic.</p> <p>Stipulations on quality and types of construction serve to restrict potential development unrealistically. Construction costs and the ability to sub-let all available space on competitive terms are extremely important considerations for commercial developers.</p> <p>In all, the potential combined impact of aspirations could have a serious detrimental effect on the ability to develop the site – to such an extent that support funding from the council would be needed to secure redevelopment.</p>	<p>within the business district, and therefore do not solely relate to this site. It is anticipated that this will be superseded by CIL. However, any proposals should demonstrate how they have considered the relationship with the adjacent open space in its design, environmental impact, and enhancement of ecological and leisure opportunities</p> <p>Given the scale of the site, it is appropriate to consider it as a key opportunity site. The revised SPD introduces general design principles for all development on Manor Royal. However, the Thales Gatwick Road guidance in the SPD recognises the site-specific opportunities and constraints. The revised SPD reflects a more pragmatic and flexible approach, and focuses on key elements of design and landscaping, rather than prescriptive land uses and design parameters.</p> <p>The Design Guidance SPD reflects the council's understanding of good design, itself a requirements of the NPPF.</p> <p>By separating the SPD from the Public Realm Strategy, it is intended that the council clearly identifies those wider aspirations for the public</p>
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<p>Thales</p>	<p>To what extent might this be available? Thales believes that the proposals on boundaries are unworkable and far too restrictive on many types of use.</p> <p>Generally on lighting, it seems contrary to the current economic climate that the council is promoting prominent lighting. Notwithstanding the environmental impact, does the council intend to make a contribution to energy costs?</p> <p><u>Specific Proposals for Site D2</u></p> <p>These are extremely restrictive suggestions and serve to make development of the site unviable. They also appear to seek to reduce the usable areas of the site significantly with much land lost to aesthetics, access, and landscaping. Significant contributions from the council would appear to be necessary to compensate the landowner/developer for these restrictions.</p> <p>Access routes from Crawters Brook and the proposed viewing platform would significantly reduce the security of the site. How would this be funded?</p> <p>The council's development aspirations are unrealistic – there is no demand for this type of development and if published the SPD would condemn the site to laying barren for many years to come. This would not deliver any form of gateway development and have quite the contrary impact on the image of the estate to that hoped for. Furthermore, the development of Crawters Brook would be unattractive to developers if this brought an additional cost burden to any scheme, without appropriate support funding from the Council. Thales is greatly concerned that our site would be massively impacted by these proposals, more so than any other site by a range of aspirations (i.e. character area, core business zone, open space, primary route, and identification as a key opportunity site).</p>	<p>realm that it will assist in funding. These are distinct from the formal design guidance of the SPD that allow flexibility for each development type depending on its location.</p> <p>Appropriate levels of lighting can enhance buildings, and it is not intended that onerous requirements are being requested. Moreover, that any applicant considers lighting as part of its overall design.</p> <p>Noted. However, the SPD has been revised to clarify important design principles that will assist in ensuring an attractive and viable business district.</p> <p>Noted. The indicative access routes are now contained within the Public Realm Strategy and were only intended as a potential opportunity rather than a formal requirement.</p> <p>Noted. Crawters Brook improvements are not intended to be delivered solely by the adjacent development.</p>
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	<p><u>Boundaries</u></p> <p>In respect of Crawters Brook, the diagram in 7.3 refers to potential for links with adjoining development – this has not previously been discussed with Thales, could the comment please be explained? Thales has no intention of agreeing any such access, or any other form of access along its boundaries.</p> <p>A number of vehicular, pedestrian and cycle routes are referred to in the document, which appear as though they may impact on the Thales site if delivered. Similarly, the diagram in section 1.7 suggests significant encroachment onto the Thales site by road or leisure use. This is not agreed by Thales and is objected to in the strongest possible terms. Please confirm that in all respects the boundary and shape of the existing Thales site will not be affected by any of the proposals or aspirations.</p>	<p>Noted. The indicative access routes are now contained within the Public Realm Strategy and were only intended as a potential opportunity rather than a formal requirement.</p> <p>Noted. The boundaries of the site are not affected, and the illustration is purely to demonstrate the potential opportunities.</p>
<p>Tinsley Lane Residents' Association</p>	<p>Gatwick road is the only access route to the Tinsley Lane residential area and the TLRA wish to record their full support for this SPD.</p> <p>We appreciate that this is only an SPD and that it represents guidelines to developers but due to the importance of Manor Royal to the future prosperity of the Borough we hope that a budget can be found to implement the landscaping improvements as soon as possible. The northern end of Gatwick Road is particularly unsightly due to the proliferation of advertisements on the factory units. Could these not be restricted to only one sign per company stating the company name and the title of their business? This SPD is not only good it is also overdue and implementation should be treated with some urgency.</p>	<p>Noted. And support welcomed.</p> <p>The signage considerations aim to request that proliferation is avoided but that does not allow restrictions to be imposed but will be considered as part of the development control process.</p>
<p>WS Planning & Architecture (on behalf of Windsor Fairlawn Ltd)</p>	<p>My client owns the site known as Premier House, which is located on the corner of Betts Way and London Road, and together with the County Oak Business Centre (in separate ownership) forms part of a larger site which is the subject of the Manor Royal/Betts Way Development Principles Statement.</p> <p>My client has previously commented on the DPS, outlining that its preparation was inappropriate having regard to the fact that full planning permission had been granted for redevelopment of the whole site under references CR/2008/0022/FUL (Premier House) and CR/2010/0033/FUL</p>	<p>Noted. New wording added to reflect both permissions.</p> <p>The revised SPD now replaces the DPS. It is considered that the SPD and Public realm strategy does follow the NPPF as it aims to identify transparency about site specific issues without being overly prescriptive, but also allows the uplift to poor environment in line with</p>

<p>WS Planning & Architecture (on behalf of Windsor Fairlawn Ltd)</p>	<p>(County Oak Business Centre). Consent at Premier House was subject to an extension of time through CR/2011/0022/FUL.</p> <p>The Manor Royal/Betts Way DPS is now out of date following publication of the NPPF, and we are very concerned that detail contained in this document has been incorporated into the design guidance SPD. We acknowledge that Paragraph 1.5.1 of the draft SPD makes reference to the NPPF, but disagree that the Regeneris Work (2008), Masterplan (2010), and Development Principles Statements (2012) reflect the NPPF approach. It is considered therefore that the wording of paragraph 1.5.5 should be amended to state 'any Development Principles Statements where there is no conflict with the NPPF'. It is considered that the wording of DPS paragraphs 4.7-4.9 is overly restrictive and does not reflect the NPPF. A degree of flexibility should be incorporated into the SPD in line with the NPPF to reflect economic circumstances at the time. Too many restrictions regarding land use hinders economic growth.</p> <p>The land owned by my client is identified as part as part of Development Site D5 and Gateway 3. The Design Principles Plan on page 29 shows the siting of a 'landmark building', to which my client has no objection and agrees that the site is properly identified as a gateway to Crawley. However, my client would like to strongly object to the wording in paragraph 3.4.1, which states <i>'it is important that high quality improvements are consistently delivered, regardless of the land use concerned, as each development opportunity comes forward'</i>. It is considered that this wording potentially restricts the development potential and commercial viability of my client's site, which has previously been granted planning permission without any such restrictions. It is considered that to hamper the development potential of the site would be contrary to NPPF paragraph 21, over-burdening investment in business.</p> <p>Further, the wording of criterion 5 of paragraph 3.4.2 (frontages) is not considered to be acceptable. My client has extant (unimplemented) planning permission for development, and should it become necessary to re-apply for</p>	<p>the NPPF. The SPD no longer provides guidance that restricts the land use types that are considered appropriate, an approach that is in line with the NPPF and adopted and emerging local plan policy.</p> <p>It is considered that high quality on the gateway site allows sufficient flexibility whilst addressing the importance of the site on the primary road frontage and as a gateway opportunity site. It is noted that this doesn't affect the existing planning permissions whilst any subsequent applications would consider the application as a material consideration.</p> <p>Noted. The revised SPD considers the permission and identifies appropriate landscaping buffers and setbacks for London Road with regards to the specifics of the application.</p>
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	<p>planning permission, the currently approved scheme would conflict with the SPD as currently drafted because the building would not be set back 15 metres from the site boundary. Furthermore, whilst substantial landscaping is proposed as part of the approved scheme, it would not be possible to provide the minimum 10 metre deep planting area immediately adjacent to the site as stipulated in paragraph 3.4.2. The proposed restrictions would required substantial modification to any future proposals for the site, and there is concern that any re-design of the building to take into account the requirements of 3.4.2 would appear clumsy and contrived, rather than appearing as a 'landmark' or 'gateway'. Further, the proposed requirements would have a significant impact on the commercial value of the site, which in my client's view has not been fully considered by the council, and for which they would have to seek compensation measures.</p>	
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APPENDIX B

Second stage of consultation for combined SPD & Public Realm Strategy

A further two week consultation period was undertaken between the 30th April-13th May

Three representations were received

A letter was sent to all those that made representations to on the first document and all commercial properties within the Business District

Press releases and notices were put in the local paper

Weblinks and web updates were on the council website

Paper copies were put in reception and two local libraries and the members room following a request to delay an additional period up to 14th June was permitted.

Respondent	Summary of Representation	Council Response
Environment Agency	<p>Biodiversity: The Manor Royal Public Realm Strategy still has no ecological assessment included. Creation of a footpath bordering a straightened and highly modified watercourse may preclude enhancements to the brook. The design proposal does not go into detail on how to enhance it. A sound baseline of the ecology of the site would provide better guidance on how to create a high quality public space and ensure a net gain for biodiversity.</p> <p>The brook is highly modified and canalised with reinforced banks and there is plenty of scope to enhance this and the habitat surrounding it. There must be a commitment to an ecological assessment and appraisal of what is achievable, before design principles are agreed. We also note that ecological enhancements will be left until project 6, which we believe will be too late. Ecological enhancement should be carried out simultaneously with other works. If all the public access is completed, altering the management and appearance of sites after public access has been achieved may create more practical challenges.</p> <p>Flood Risk: We note our previous concerns have been mainly addressed. We have no further comments to make. Groundwater Protection: We note our concerns have been addressed. We have no further comments to make. Green roofs and Water Efficiency: We note our concerns have been addressed. We have no further comments to make.</p>	<p>The council has undertaken a review of wildlife sites in the borough, including Crawters Brook (September 2010). This work includes assessment of species present on site, and sets out management recommendations that should be considered as part of any public realm improvements. The assessment can be viewed at http://www.crawley.gov.uk/pw/web/pub177870</p> <p>Noted. The content and recommendations of the Wildlife Assessment Report will be more clearly referred to in the SPD, and text will be amended to more clearly reference its recommendations.</p> <p>Noted and agreed</p> <p>Noted and agreed</p> <p>Noted and agreed</p>

<p>Gatwick Airport Safeguarding</p>	<p>We are really pleased to see that Aerodrome Safeguarding now has its own section being 2.9 'Gatwick Specific Issues'. We would like to make the following comments:</p> <p>Para Two – AOA/CAA The AOA documents are guidance notes however the CAA publications are legislation. Would it be possible to change the wording to the following; <i>'There are a number of guidance documents available from the Airport Operators Association (AOA) at www.aoa.org.uk/operations-safety/ There are also a number of CAA publications (CAP's) which are legislative and are available at www.caa.co.uk, the most relevant being CAP168 'Licensing of Aerodromes', chapter 4 and CAP772 'Birdstrike Risk Management'.</i></p> <p>Para Three – Building Heights We would be grateful if crane and construction equipment heights could also be mentioned in this paragraph, for example: <i>'In relation to building, cranes and other construction equipment heights.....'</i></p> <p>Para Four – Landscaping Etc We would be grateful if the wording could be amended to the following: <i>'Large expanses of green and/or shallow pitched roofs and green walls close to the airport will be attractive to birds. The roofs will be attractive to gulls for nesting roosting and loafing and may increase incidents of bird strike. GAL may request that these design features be netted to ensure that birds are not attracted. It is possible to design substantial and interesting landscaping schemes in a manner which will provide biodiversity and will not increase the bird strike risk to Gatwick Airport. Early dialogue with the GAL Safeguarding Officer is recommended. Further general advice can be found in AOA advice note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design' and AOA advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes' and AOA advice Note 8 'Potential Bird Hazards from Building Design' all available at www.aoa.org.uk/operations-safety/</i></p>	<p>Noted. Text to be amended</p> <p>Noted. Text to be added</p> <p>Noted. Text to be added</p>
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	<p>General Comments</p> <p>AOA Website – Please note that the AOA website address has now changed to www.aoa.org.uk/operations-safety/ At the end of the first sentence (GAL) should be added after 'Gatwick Airport'.</p>	Noted. Text to be added
Highways Agency	No comments to make	Noted.
Network Rail	No comments	Noted
Natural England	<p>Natural England does not consider that this document poses any likely or significant risk to the natural environment. The SPD clearly promotes an improvement to the environment of Manor Royal, which includes, <i>inter alia</i>, biodiversity and green infrastructure enhancements, greening the built environment, sustainable transport routes, sensitive lighting and considerations on managing and maintaining Crawler's Brook; all of which we welcome.</p> <p>We advise that the SPD seeks to protect the ecological interest features on site, and does not impact the features of nearby Local Wildlife Sites or Ancient Woodlands. It would be helpful therefore if Ancient Woodland (together with any connecting woodland including that along Crawler's Brook) and local wildlife sites are identified within the document. It may also be desirable that our standing advice for Ancient Woodland and Protected Species is referenced in the document (links to documents provided).</p> <p>We note the proposal for a cycle route alongside Crawler's Brook, the development of which is accepted in principle. However in regard to this, we advise that any potential indirect impacts in relation to Rowley Wood local wildlife site and as an Ancient Woodland site are investigated at the application stage and a note made to this effect in the Design Guide.</p>	<p>Noted and support welcomed. Text to be added to final document</p> <p>Text & links to be added to final document</p>
Barton Wilmore, on behalf of Segro	Our previous comments highlighted concerns about the proposed approach to design and public realm in the draft SPD, which SEGRO considered to be too prescriptive, potentially stifling development	

<p>Barton Wilmore, on behalf of Segro</p>	<p>opportunities at Manor Royal, particularly in the context of a difficult market which is likely to persist for part of the plan period.</p> <p>General: It should be more explicitly stated in the introductory section of both the documents that the Manor Royal Design Guide SPD is a Planning SPD which will form a material consideration in planning decisions, and that the Manor Royal Public Real Strategy is a document which informs the evidence base of the SPD and provides all of the detailed elements of the projects and improvements.</p> <p><u>Manor Royal Design Guide SPD</u></p> <p>Section 1 Manor Royal Business District: As noted in Section 1.2 'Background and Context' of the Manor Royal Design Guide Draft SPD, the range of uses which have been developed at Manor Royal have created a distinctly different character to its initial 'New Town Industrial Estate' form, and has moved away from being a spacious and well landscaped estate as originally conceived. However, it should be noted that a more flexible approach to development has enabled the Business Park to evolve in line with market interest.</p> <p>Section 1.4 'Policy Background' states that the objective of the SPD is to support economic growth and to ensure that new development makes a significant contribution to the area securing the delivery of a high quality environment, whilst allowing for a more pragmatic approach to land use and design that enables the market to function more freely. SEGRO support this in enabling a proactive approach to development opportunities at Manor Royal.</p> <p>Section 2 General Design Principles: The objectives in Section 2 state that proposals must demonstrate how development strengthens and relates to the identity of Manor Royal; increases movement and permeability; assists in wayfinding and orientations; and at key gateway sites, reflect and signify the importance of their location and the scale of opportunity. In order to maintain a flexible approach we strongly suggest that the wording in the SPD is revised to emphasise that proposals</p>	<p>Noted: Text to be strengthened in final document.</p> <p>Noted</p> <p>Noted</p> <p>It is a requirement that with a design and access statement or supporting information that any development considers how it has addressed the design principles or why it is not appropriate or viable to do so. Proposals will be considered on a case by case basis and pre-application discussions are encouraged</p> <p>Noted.</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>should seek to meet these design requirements, but not as a definitive development standard.</p> <p>Section 2.1 Buildings: SEGRO supports the intention under the development proposals requirements set out in 2.1 'Buildings', to seek higher buildings at or adjacent to gateways where a stronger built form is required to provide identity and a sense of arrival, so long as this does not stifle development opportunities at gateway sites such as SEGRO West. SEGRO's intention for SEGRO West is to bring forward a high quality development, with design considered on an individual basis and the specifics of design detail dealt with at planning application stage, not prescribed by planning policy.</p> <p>Section 2.1 'Buildings', also states that proposals should seek to provide active frontages to routes within or adjacent to the site. It is suggested that this is amended to enable greater flexibility, and should be revised to read "proposals should seek to provide active frontages to routes within or adjacent to the site where practical and appropriate".</p> <p>Consideration of green roofs is also a development proposal requirement under 2.1 Buildings. It is important that it is clarified that consideration of green roofs is required where practical and appropriate, in order not prevent over prescriptive requirements which could hinder development.</p> <p>Section 2.2 Landscape and Open Space: Section 2.2 'Landscape and Open Space', refers to green roofs. It is vital that it is made clear that this will only be sought where appropriate. Section 2.2 further states that high quality and attractive street furniture should be provided that does not detract from the building and landscape. However, it is not clear how this will be funded and it is essential that it is clarified that this will only be sought where viable, without impacting on the deliverability of the scheme.</p> <p>Section 2.3 Amenities and Green Space: Section 2.3 'Amenities and</p>	<p>One of the key principles in the SPD is that the development considered both road frontages on this particular site and this supports NPPF principles of good design. It is not considered that this is overly prescriptive and early discussions with CBC are encouraged.</p> <p>Noted. Green roofs are to be considered and development should state where it is not appropriate and why it is not viable in any supporting statements.</p> <p>Noted. The principles aim to re-iterate the importance of high quality development and consideration of the wider development rather than prescribing additional financial burdens in relation to street furniture.</p> <p>Noted. The principle of employee amenity has</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>Green Space' sets out requirements for providing green space for employee enjoyment and recreational facilities. It is important that it is made clear that this will be required where viable, without impacting on deliverability. In addition, it should only be a consideration on a site by site basis as it may not be appropriate or possible to deliver such amenity on certain sites.</p> <p>Section 2.4 Parking and Servicing: Section 2.4 'Parking and Servicing' requires that any significant on-plot provision should be sited away from public frontages and behind the building. We suggest that a caveat is added to clarify that these design principles will be required where viable and deliverable, to ensure that developers are not bound to unviable or undeliverable requirements that could hinder the deliverability of development. In addition, this policy needs to be applied practically on a site by site basis, taking account of site characteristics such as access and building layout.</p> <p>Section 2.5 Advertisements and Signage: Section 2.5 'Advertisements and Signage' requires Design and Access Statements to evidence a considered approach to signage and make reference to neighbouring development and views from public areas. It is important that this principle is balanced with the practical operation of businesses at Manor Royal and does not prevent businesses from being sufficiently sign-posted. The Council will appreciate the importance of branding for a company.</p> <p>Section 2.6 Site Boundaries: Section 2.6 'Site Boundaries' requires all new developments on key frontages to use where appropriate an indigenous hedgerow. Any additional security requirements may be considered behind a significant landscape strip and no security style fencing will be used immediately at the back of public pavements. It is considered that this level of detail goes beyond the scope of an SPD (i.e. general design principles), and could deter potential occupiers who have specific security requirements essential for the operation of their business, particularly when there are specific species of hedging that provide security, sometimes negating the need for fencing.</p>	<p>been raised by a number of studies and should be considered where viable and appropriate. This will be considered on a case by case basis.</p> <p>Noted: This will be considered at planning application stage on a site by site basis but the principle of avoiding dominant areas of car parking on site frontages is still relevant. The issues of utilising landscaping set backs aims to address this.</p> <p>Noted and agreed.</p> <p>Noted. It is noted that on a site by site basis security fencing and landscaping may be</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>The type of industries Crawley is specifically seeking to attract to Manor Royal is highly likely to require security. The guidance should avoid being too prescriptive, and this wording should be revised to state that security style fencing should be designed carefully where appropriate and should have regard to the adjacent plots, particularly where development has already occurred. In addition, this policy should only apply to redevelopment proposals and not in relation to any temporary facilities prior to redevelopment.</p> <p>Section 2.7 Lighting: Section 2.7 'Lighting' includes design principles for lighting and sets out that lighting should be used sparingly and with care to avoid unnecessary security lighting. It is important that this design principle is not at the jeopardy of the security, functionality and branding of businesses at Manor Royal, and this should be clarified within the SPD.</p> <p>Section 2.8 Sustainable Transport: The objective in Section 2.8 'Sustainable Transport' to extend the existing network to improve permeability and increase options for sustainable travel is supported by SEGRO, provided that this is in dialogue with existing businesses to ensure that what is proposed is in line with occupier needs and does not encroach onto development sites.</p> <p>Section 3 Road Frontages and their Hierarchy: Specific design requirements are included for Fleming Way (a primary road) in section 3.1.2, and guidelines are included for London Road (a primary road) in section 3.1.3. SEGRO is concerned that these landscaping requirements could be overly prescriptive and could place an undue restriction on the developer which could serve to hinder development. Of more concern, however, is the fact that such a depth of landscaping of 10 metres will reduce site coverage. A reduced site coverage could affect the commercial viability of the site and could render the site unviable to developers. This could result in development not coming forward.</p> <p>Section 4.2 Gateways: In Section 4.2 'Gateways' SEGRO West is identified as a Key Opportunity Site within the Core Business Zone</p>	<p>critical issue. However the principle of addressing well landscaped security fencing is appropriate as a design principle on a business district basis.</p> <p>Noted. Lighting is proposed to enhance the design and aesthetic of the buildings and not to prejudice or impact adversely on the function of the site. However it is important that lighting issues are considered at the early design stages and integrated into development proposals. .</p> <p>Noted. This is in line with NPPF and existing planning policies.</p> <p>Noted. The SPD seeks to deliver improvements across the Manor Royal environment, and provision of an appropriate level of landscaping is viewed as an important means of addressing a generally poor relationship between the private and public realms. The council would therefore wish to ensure that opportunities are fully explored through site layout and design to comply with the SPD requirements. Proposals will however be assessed on a case-by-case basis, and it developers will need to provide robust</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>character area, where development proposals should demonstrate how they maintain the spacious setting of buildings, build on the impact of high quality public realm, provide active frontages and explore the potential for taller buildings. These general principles are supported, provided they are applied appropriately to proposals, balanced with developer aspirations.</p> <p>On Figure 8, a gateway/landmark building is indicated at the junction of Fleming Way and London Road. Although the Council's aspiration for high quality development on this site is supported there is concern that the term 'landmark building' is not clearly defined, particularly the exact location. A development that has to hug the roundabout corner creates layout and circulation difficulties. This could serve to stifle development if it remains this prescriptive.</p>	<p>justification to demonstrate reasons why landscape requirements cannot be met.</p> <p>Other restrictions have been removed regarding heights, set backs etc. However the landscaping proposals are required on the key site as a primary frontage and gateway site to demonstrate an uplift in the environment. The landscaping is considered to be an important aspect in delivering this uplift.</p>
<p>Barton Wilmore, on behalf of Segro</p>	<p>The section sets out design principles for Gateway sites. It should be clarified that whilst the SPD seeks high design standards at key Gateway sites and frontages, 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. In order to maintain a flexible approach we strongly suggest that the wording in the SPD is revised to emphasise that proposals should seek to meet these design requirements, but not as a definitive development standard.</p> <p>Section 4 Key Development Sites: In Section 4.3.3 'Key Development Sites' SEGRO West (D4) is identified as a key opportunity site, offering an opportunity to create a gateway development of high quality design. SEGRO supports the aspiration for high quality design, as demonstrated by the Thales scheme. However, this section states that at SEGRO West a master-planned approach is sought. SEGRO considers that this requirement is potentially onerous and time-consuming, and not necessary in order to implement high quality design at SEGRO West. Indeed it could slow down development at the site, which is more harmful to the long term future and development opportunities at SEGRO West</p>	<p>Noted. The landscaping mirrors that of the adjacent site at Thales, London Road and is based on an assessment of surrounding development and the degree to which the landscaping can forms an integral part of the frontage of the site.</p> <p>The design of the building should orientate to the gateway and there is no specific landmark definition but officers are happy to discuss this further with regard to specific proposals.</p> <p>The SPD does not prescribe land uses nor does not restrict to office development. Therefore the document wording is considered to be necessary and appropriate.</p> <p>The expectations for a master plan are required to ensure that development proposals do not restrict the potential development of the rest of the site and this is considered to be an appropriate approach for the larger site.</p>

<p>Barton Wilmore, on behalf of Segro</p>	<p>and contrary to Paragraph 21 of the NPPF (2012) which states that investment in business should not be over-burdened by the combined requirements of planning policy expectations.</p> <p>Figure 11 identifies a landmark building at the junction of Fleming Way and London Road. As set out above, it should be noted that a development that has to hug the roundabout corner creates layout and circulation difficulties. This could stifle development if it remains this prescriptive.</p> <p>Section 4.3.3 sets out that the roundabout provides a good opportunity for public art, high quality landscape and signage, and that proposals should create legible routes for pedestrians, cyclists and vehicles. Although this approach is supported as it builds legibility and permeability at Manor Royal, it is important that the viability and practicality impacts of any such proposals are carefully considered.</p> <p>Under 'Site Frontages' in section 4.3.3, it is advised that the SPD does not set rigid guidelines regarding the height of new buildings but does emphasise the need for high quality design, including urban design. The SPD highlights the importance of appropriate scale responses to the identified gateways. The Council will also carefully consider whether schemes for low buildings would provide an adequate degree of enclosure to important frontages, such as London Road. SEGRO supports this more flexible approach.</p> <p><u>Manor Royal Public Realm Strategy</u></p> <p>Section 1 of the Public Realm Strategy provides a summary of strengths, weaknesses and opportunities at Manor Royal. Although this section clearly recognizes some of the key challenges at Manor Royal in terms of vacant buildings, it is imperative that it does not then go on to seek</p>	<p>Noted. See above. There is no definition of landmark, but a development should demonstrate how it has considered its key location at the gateway and its prominent location on two primary frontages and that any development reflects its location and the opportunity to deliver an uplift at the entrance/exit of the business district.</p> <p>Noted. This is to be considered in connection with the Public Realm Strategy</p> <p>Support noted</p> <p>Noted and agreed.</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>restrictive design principles as a solution, which could in fact stifle development and worsen the situation.</p> <p>The Public Realm Strategy sets out six objectives for Manor Royal. These six objectives set out the principle aims of the Public Realm Strategy in establishing clear design guidance that will result in a quality image and environment for Manor Royal. Whilst this is supported in principle, it is considered that some of the objectives insofar as they relate to the creation of high quality buildings and public realm with a consistent design approach are likely to have a contrary effect on growth, and it is important that viability and deliverability are recognised as a key objective for Manor Royal. Indeed, paragraph 6 of section 1 highlights Paragraph 21 of the NPPF (2012) which emphasises the need for Local Planning Authorities to assist in building a strong and competitive economy and that planning should not over burden investors and businesses with policy expectations, but should look to address potential barriers to investment and in 1.5 there is a commitment to supporting economic growth. If the Public Realm Strategy is to meet this aim it is essential that a balance is struck between design principles and economic growth at Manor Royal.</p> <p>Section 2 – Gateway 3 London Road/Fleming Way: Gateway 3 London Road/Fleming Way is identified as one of the proposals to deliver Objective 1: To strengthen the identity of the whole of Manor Royal through the guiding principles of environmental improvement and landscape hierarchies of the gateways and roads. It is considered that the requirements set out are inappropriately prescriptive, and could impact on occupier requirements and potentially hinder development opportunities. In addition, it is important for the Public Realm Strategy to emphasise that landscaping schemes should not impact on scheme viability and deliverability.</p> <p>Section 2 – Proposal 3 Public Realm Improvements to SEGRO West London Road (D4): Proposal 3 SEGRO West is identified as a proposal in working towards Objective 2: encourage quality landmark developments at the key gateways and opportunity sites. Emphasis is</p>	<p>Noted.</p> <p>Noted.</p> <p>The role of the gateways is to strengthen and improve the entrance/exit of manor Royal and facilitate an uplift with regard to design and function. The public realm elements are illustrative and will assist in improving areas of</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>placed on creating legible routes, and creating a high quality public realm. We suggest that guidance should avoid being too prescriptive, and that the tone and wording is changed to be explicit that these elements will be sought where appropriate and viable. Such requirements could unnecessarily stifle economic regeneration in the area.</p> <p>A landmark building is indicated at the junction of Fleming Way and London Road on Figure 12. There is concern that the term 'landmark building' is not clearly defined, particularly the exact location. As noted above, a development that has to hug the roundabout corner creates layout and circulation difficulties. This could serve to stifle development if it remains this prescriptive. It should also be clarified that whilst the Public Realm Strategy 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> <p>In order to maintain a flexible approach we strongly suggest that the wording in the Public Realm Strategy is revised to emphasise that proposals should seek to meet these design requirements, but not as a definitive development standard.</p> <p>SEGRO support the proposals for Fleming Way and London Road. However, it is not clear how the proposed improvements and long term maintenance will be funded and if the cost would fall to developers/occupiers or a range of funding opportunities(?)</p> <p>Section 2 – Primary Roads: Section 2 Primary Roads sets out proposals for achieving Objective 3: ensure landscaping of new developments respond to the hierarchy of roads. Fleming Way Proposals PR2 and London Road Proposals PR3, set out extremely detailed landscaping requirements including maintenance regimes, species, soft materials palette and hard materials palette. Whilst these design</p>	<p>the public realm. The text is to remain unchanged but early pre-application discussions are encouraged..</p> <p>The role of a landmark building and landmark development will re-enforce the gateway. Detailed decisions will need to be on a case by case basis but applications are expected to demonstrate how they enhance the gateway location.</p> <p>Landmark is not defined to ensure that it is not overly prescriptive but allows for a variety of factors such as height massing and design to define landmark, but with clear regard to the gateway roundabout.</p> <p>It is anticipated that all development will meet this standard and decisions on a case by case basis will be required and pre-apps encouraged.</p> <p>These public realm proposals are to be funded from a variety of funds and are not as cost to individual developers beyond adopted s106 payments before the introduction of CIL.</p>
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<p>Barton Wilmore, on behalf of Segro</p>	<p>principles provide useful guidance, it is important that these requirements are balanced with the viability and deliverability of development schemes.</p> <p>Section 2 – Objective 4: The aim of Objective 4: to increase and improve the direction signage outside of the Manor Royal boundaries and to increase the branded signage within the estate is to improve wayfinding and contribute towards strengthening the identity. This section proposes clear and consistent signage and avoidance of visual clutter. It is important that this principle is balanced with the practical operation of businesses at Manor Royal and does not prevent businesses from being sufficiently sign-posted. The Council will appreciate the importance of branding for a company.</p> <p>Section 2 - Objective 5: The proposals set out to deliver Objective 5: to increase movement and permeability through the provision of a sustainable access network, and this sections sets out proposals for improving cycle, pedestrian and vehicular routes are supported by SEGRO, provided that this is in dialogue with existing businesses to ensure that what is proposed is in line with occupier needs and does not encroach onto development sites.</p> <p>Section 2 - Objective 6: is to ensure an appropriate scale and mix of complementary uses and amenity facilities that support the economic function of the Business District. The design principles set out could increase costs and potentially reduce site coverage which will adversely affect the commercial attractiveness of the site, stifling development, and it is important that this is considered in applying these design principles.</p> <p>Section 3 – Delivery and Next Steps: Section 3 notes that private sector development will be crucial in the delivery of the Manor Royal vision. It is therefore imperative that this section, in setting out anticipated funding opportunities at Manor Royal, emphasises the importance of recognising developer needs in delivering a viable and developable scheme. Clearly a balance needs to be struck between enabling good quality design at Manor Royal, and allowing a flexible approach to</p>	<p>Noted. This was an illustration for the Public realm strategy as an option and does not prescribe rigid planting requirements.</p> <p>Noted. This is not expected to restrict essential signage but to ensure that unnecessary clutter is avoided.</p> <p>Noted.</p> <p>This relates to the lack of amenity space and facilities as defined by numerous studies. There are some options for delivery for Business District as a whole where specific areas are identified for specific development. The consideration of employee requirements should be considered individually by each developer.</p> <p>Noted. In line with the NPPF issues of viability can be considered at the planning application stage on a case by case basis and the distinction between the roles of both documents is to be enhanced within the</p>
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	<p>development in order to tackle development stasis at Manor Royal.</p> <p><u>Conclusion</u></p> <p>SEGRO welcomes the revisions to the SPD and the separation into two documents, a formal SPD and a more detailed Public Realm Strategy which is not a formal planning document, in response to concerns relating to the level of detail in the document. However, the SPD and Public Realm Strategy still contain prescriptive design considerations. It would be more appropriate to replace these requirements with general guidelines and to emphasise the importance of viability in delivering schemes. In general the policy requirements and supporting text are still unnecessarily prescriptive.</p> <p>It is important that CBC consider in detail the costs of requiring developers to undertake and deliver the design principles as part of application proposals and should undertake viability testing as part of the viability appraisal of the SPD in accordance with paragraph 173 of the NPPF, which requires the costs of any requirements likely to be applied to development to provide competitive returns to enable the development to be deliverable. In addition, it is essential that the Council considers the potential impact of the design principles on space implications, layout and developable area.</p> <p>Including highly prescriptive design principles in the SPD and supporting Public Realm Strategy goes against the provisions as set out in Paragraph 21 of the NPPF (2012) which states that investment in business should not be over-burdened by the combined requirements of planning policy expectations. Local planning policy should support existing business sectors and policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances and plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.</p> <p>The NPPF looks to ensure the benefits of economic development are</p>	<p>documents. Text to be clarified.</p> <p>Noted.</p> <p>It is not considered that the design principles over burden the developer but more provide certainty and clarity over the key issues that are important to create an uplift in the environment.</p> <p>Noted. This is why the documents do not prescribe uses, forms or scale of development or significant reductions to site area coverage.</p> <p>Noted. The document has been amended substantially with regard to uses, form, set</p>
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	<p>given sufficient weight in the decision making process in the context of the current economic climate. SEGRO supports such an approach and urges CBC to be realistic in its expectations of development and what development can achieve and afford. The approach CBC takes to town planning decisions and the strategy for spatial development across the administrative area should be cognisant of this economically difficult context.</p> <p>SEGRO would urge CBC to think more flexibly about design principles across Manor Royal so that opportunities for development which are supported by market demand are delivered. The alternative is to see sites remain under-utilised and vacant for an indefinite period. As demonstrated by the Thales scheme on London Road, which is recognised as a successful scheme within the emerging SPD, it is clear that SEGRO is committed to good quality design. The comments immediately above in this conclusion section apply to all the SPD policies and Public Realm Strategy Guidance.</p>	<p>backs etc following previous representations and now considers a more pragmatic and flexible approach, whilst encouraging early discussions regarding case by case circumstances.</p> <p>Noted. See comments above</p>
<p>WS Planning & Architecture on behalf of landowners at Betts Way</p>	<p>Further to the subsequent consultation, we have reviewed the responses by other stakeholders and the council replies to them and ourselves. We feel that although the idea of a separate Manor Royal SPD and Public Realm Strategy might appear less prescriptive and restrictive we feel that in actual fact it has not moved far enough in recognising the issues raised. We would like to reinforce our earlier comments set out in my previous letter dated 12 February 2013 and endorse those of other stakeholder representatives.</p>	<p>See Appendix A for detailed responses</p>
<p>Tinsley Lane Association</p>	<p>The TLRA strongly supports the proposed SPD and PR Strategy for Manor Royal but wishes to make the following comments:</p> <p><u>Re: Paragraph 2.4</u></p> <p>The provision of adequate car parking is a necessity even while the use of public transport is being encouraged. Where space is limited the provision of underground car parks could be encouraged.</p> <p><u>Northern Industrial Zone</u></p>	<p>Noted</p> <p>Under croft car parking can be a design solution but can also be costly and prescribing particular design solutions would restrict development choice. Sustainable options to non-car travel is however to be encouraged.</p>

	<p>This is a major problem area which is currently significantly below the standards proposed in the SPD but would not be affected by it as it is not planned for redevelopment.</p> <p><u>Public Realm Strategy</u></p> <p>The PR Strategy would appear to be the only means of encouraging existing businesses to conform to the desired design principles of the new Manor Royal Business District. Would it be possible to include in Proposal S2 examples of signage and advertising that would be compatible with the SPD? The current proliferation of advertisements and visual clutter is clearly desired by the individual businesses but is highly undesirable to the business district as a whole so some guidelines could be appropriate.</p>	<p>Noted.</p> <p>It is not appropriate to prescribe signage requirements as these are very individual but the issue of reducing clutter is retained.</p>
<p>Jones Lang La Salle on behalf of Thales</p>	<p>As Thales and JLL have stated previously, through discussions with the Council and representations made to the emerging SPD from 2010, Thales supports the Council's aspirations to attract further investment into Manor Royal, is committed to supporting the development of Manor Royal and indeed, is committed to the Borough as a whole.</p> <p>However, Thales is concerned that its representations have not wholly been taken on board and this relates both to the level of consultation undertaken in the preparation of both the draft SPD and the Public Realm Strategy, as well as the prescriptive level of guidance within the documents, which it feels could prevent development from coming forward at Manor Royal. Therefore, Thales requests that all previous representations be taken into account when assessing the guidance within this document.</p> <p>These overarching issues are considered below followed by specific comments on draft SPD.</p>	<p>Noted, and support for the council's aspiration to improve the Manor Royal environment to attract investment is welcomed</p>

	<p>The Consultation Process</p> <p>In terms of the consultation process it should be noted that the draft SPD and Public Realm Strategy were initially issued at 4.30 PM on 30th April 2013 and the end of the consultation period is 13 May.</p> <p>Taking into account bank holidays this left only eight working days to review the two documents which total 96 pages. A six week consultation period would be more appropriate and much fairer.</p> <p>It is noted that the Council has acknowledged this timescale issue and agreed to meet with Thales to discuss the issues raised so far and providing an additional short timescale to comment on the document.</p>	<p>Throughout the SPD drafting process, the council has at all stages ensured that stakeholders are informed of consultation dates and document production timetables. Following a statutory four-week period of consultation, the council amended the document to take account of feedback and published the document for a further two-week consultation period. The council has worked closely with stakeholders to provide flexibility in terms of consultation deadlines, and this has included a delay to a later Cabinet report date of 10 July. During this time, all respondents were informed of the timescales and afforded the opportunity to provide further comments as appropriate.</p> <p>Thales and their agents were also given an extended period of consultation to 25th June as requested following the meeting.</p>
<p>Specific SPD comments:</p>	<p>Officers provided a high degree of comfort at the meeting that the Council wish to promote development on the Gatwick Road site and that if proposals were to come forward, which could not meet the requirements set out in the SPD that the Council would take a pragmatic and flexible approach in determining the proposals.</p> <p>On the basis of the assurances provided at the meeting, it is understood that Officers are in the process of revising the SPD to take into account some of the issues raised by Thales albeit, the document is not available to review at the current time.</p>	<p>Officers met with Thales and their agents on the 17th June and discussed that there may be exceptional circumstances on a case by case basis where the specifics of the development proposed may warrant an alternative approach to that specified in the SPD. However, the SPD should be considered as the requirements for all developments, in order to provide clarity and consistency over expectations. Pre-application discussions are encouraged to raise issues and concerns at an early stage and site specific circumstances. . This has been discussed at the meeting and in</p>

		<p>subsequent telephone calls with the planning agents. CBC will continue to work closely with Thales on any development proposals as they do with all land owners.</p>
	<p>The Need for the SPD and/or the Public Realm Strategy</p> <p>Even with the changes made to the document and the separation of the guidance into a Design Guidance and Public Realm Strategy Thales is concerned that these documents still provide an overly prescriptive policy framework in respect of its site at Gatwick Road (known as site D2) and ultimately question whether either of the documents are actually required.</p> <p>This is because of the following reasons:</p> <ul style="list-style-type: none"> • The guidance within the documents is overly prescriptive and is not flexible enough to respond to changing market demands. • It appears that no firm commercial/agency advice or evidence seems to have been considered by the Council in drafting both the SPD and Public Realm Strategy. • It appears that no architectural or transport advice has been sought by the Council to determine if its design aspirations are actually deliverable; • Thales has not been consulted on the proposed layout plan for its site (which is still not available); • It appears that no costing advice has been sought in relation to the various schemes / aspirations; and • No realistic funding streams have been identified by the Council to support the aspirations within the documents. N.B. If new development at Manor Royal is expected to contribute to all (or a significant amount) of the funding for these schemes it is likely to prevent new development from coming forward (particularly at Thales site at Gatwick Road). 	<p>Noted. The Manor Royal Design Guide SPD has been identified by the council and Manor Royal Business Group as a key mechanism to help achieve objectives to improve the overall Manor Royal environment and attract investment.</p> <p>The requirements of the SPD are in place to help achieve these objectives, and it is considered that the guidance set out is reasonable and sound. It is however recognised that in exceptional circumstances, development may not be able to fully comply with the SPD objectives. In these specific instances the council would require development to demonstrate at the pre-application/planning application stage reasons as to why the SPD recommendations cannot be achieved.</p> <p>There is no site plan layout for Gatwick Road nor is it to be developed, and it is acknowledged that this expectation was based on ambiguous wording which is to be removed. Text on site plan to be amended.</p> <p>The SPD does not provide specific layouts, set backs, or building plot ratios etc and therefore specific viability has not been undertaken. However general viability issues in relation to</p>

	<p>Thales' concern is that the Council's approach will still blight the site for years to come, undermine the financial case on which it based its decision to invest in Manor Royal, and could potentially hamper its ability to make future investments into its business, including at Manor Royal.</p>	<p>removing set backs, specific building heights and locations have been removed following consultation.</p> <p>The individual landscaping requirements are site specific and based on neighbouring uses and settings, and reflect the assessment of recent development and Thales own development on London Road.</p> <p>It is not the intention that new development funds additional public realm proposals beyond their site boundaries other than the existing s106 requirements for public realm improvements within the s106 adopted SPD. This is to be replaced when CIL is adopted.</p>
	<p>The Main Issues that will prevent the Site from being developed:</p> <p><i>The Designation of the Site as a 'Key Site'</i></p> <p>The Council sets out its guidance in relation to the identification of key sites on page 7 of the draft SPD, stating that:</p> <p><i>"Following assessment of the main opportunity sites that have arisen through businesses vacating premises and sites at gateway locations, there are a number of key sites that are currently available for development. These include sites at gateways or on primary road frontages, where the need for a site specific design response is considered critical to raising the quality of the environment."</i></p> <p>This should not apply to Thales' site at Gatwick Road. Simply to seek to designate a site for a landmark building / key gateway site because it is vacant, to impose severe restrictions on how it can be developed in design terms does little to enhance the chances of the site being brought forward for re-development and, in this case, is likely to be detrimental to the effect of causing the site to lay barren for many years. Thales would</p>	<p>Noted. The Gatwick Road site, by way of its prominent junction location and significant frontage, is considered by the council to justify its identification as a Key/Gateway Site and given this , it is considered that high-quality design is justified</p> <p>In referring to the need for a landmark building, the SPD seeks to ensure that proposals are of an appropriate design, scale and massing that reflects the prominence of the site, and maximises opportunities to improve the Manor Royal primary road frontage and gateway site.</p> <p>It is not therefore considered that identification of the Thales site as a Key/Gateway Site represents a constraint to the viability or deliverability of the site. Rather it is considered that the requirements set out by the SPD</p>

	<p>like to understand what the financial business case for tenants or developers is and what background evidence the Council has to justify the extra expense this will cost a developer if it was to bring the site back into beneficial use.</p> <p>Furthermore, Paragraph 21 of the NPPF highlights that planning should not over-burden investors and businesses with policy expectations, but should look to address potential barriers to investment. Thales believes that the SPD fails to comply with this requirement in that the expectations for the design of site D2 are over-ambitious, will be financially burdensome for developers and as a result are in themselves a potential barrier to investment.</p> <p>Thales has previously expressed its concerns that the SPD will cause this site to lay dormant for a significant period. The consequence of this is that it will over-burden Thales as the existing business owning the site and would similarly constrain new investors on the site. This is a major issue for Thales and all elements causing concern must be removed before the SPD is presented to Members.</p>	<p>reinforce the NPPF principles of good design and delivering quality improvements to the built environment, whilst providing clarity over planning requirements.</p> <p>If development is unable to fully comply with the SPD objectives, the council will require clear evidence to demonstrate at the pre-application/planning application stage reasons as to why the SPD recommendations cannot be achieved, however this would be in exceptional circumstances.</p> <p>At the meeting with Thales and telephone conversations it has been noted that they feel that the SPD will further restrict potential uses, however the Council considered that land uses, (other than retail), are now not restricted and would be considered on a case by case basis.</p> <p>The improvements to the landscaping and aesthetic of the site are considered to be NPPF compliant and do not over burden investors, given that they now focus on improving the look and feel of the site rather than use, set backs, plot ratios etc ensuring the frontages are of high quality.</p>
	<p>On this basis, Thales asks that the Council takes a 'step back' to understand whether either document is actually required.</p> <p>In short, Thales feels that both documents are not needed or required and will ultimately prevent development from coming forward at Manor Royal.</p>	<p>Noted. This request has been discussed in detail and, as the Thales reps remain primarily the same, there is no merit in delaying the decision by Cabinet. All of Thales detailed comments are available for the Cabinet members to consider. Moreover there are current pre-apps and applications that would be affected if the SPD adoption were to be delayed further.</p>

	<p>The designation of the site within a Core Business Zone and as a Gateway Site</p> <p>The document continues to set out the general designation of the site within a 'Core Business Zone' (Figure 7/Section 4.1) and it's identification as a 'Gateway' site. This is contrary to the representations previously submitted, and all previously made representations are hereby re-stated and not reduced, removed or superseded by this submission and should be considered in conjunction with this submission. Therefore Thales' objection still stands and should be taken into consideration before the SPD is presented to Members.</p> <p>It is understood from discussions with Offices that the reference to a 'Core Business Zone' is simply in order to encourage high quality business like design of the buildings within it. However, in terms of the Gatwick Road site, it is unlikely that it will be able to come forward for office type development and may therefore not be able to satisfy this requirement.</p>	<p>Noted. The SPD is a design based document and does not seek to prescribe land uses. This is clearly stated throughout the document. For clarity, the Core Business Zone refers to the dominant character of this part of Manor Royal, and does not seek to prescribe or limit the use class of proposals to B1 office.</p> <p>Noted. Text has been re-considered and amended. Please see responses in appendix A</p>
	<p>Whilst the supporting text states that "The objective of this Design Guide SPD is to support economic growth." Thales' commercial opinion and the advice received from JLL agency team indicates that the SPD will cause its site at Gatwick Road to lay dormant for several years, contrary to the objective of the SPD.</p>	<p>Noted. However the design requirements do not restrict uses and pre-application discussions are welcomed to consider proposals on a case by case basis.</p>
	<p>Officers have stated that all types of employment or quasi employment uses could be accommodated on the site. Whilst this is good to hear, it is not clear within the policies contained within the SPD. Therefore, it must be made clearer within the text, that the Character Zone designation does not prevent the development of the site for non-business/office uses (such as industrial or warehousing development).</p> <p>Currently the policy implies that only proposals falling under Use Class B1 will be acceptable in the area (and on the Gatwick Road site) and is</p>	<p>The SPD does not preclude, or specify any land uses, which is compliant with the NPPF. (retail aside). However Text will re-iterate that the Core Business Zone doesn't not restrict to B1 uses.</p> <p>The allocation is based on the GVA</p>

	<p>therefore, contrary to NPPF which does not support such designations where there is no reasonable prospect that they will be brought forward for the intended use (Para 22).</p> <p>The site itself is entirely separated from the other areas of the designated Business Zone by the physical barriers of Crawters Brook and the road network. Gatwick Road is also heavily populated by retail and industrial use buildings with very little office space in close proximity. It seems entirely opportunistic that the Council is seeking to classify the site as within a business zone simply because it is vacant and has no basis in commercial reality.</p> <p>It should be noted that following over 3 years of active marketing, the only realistic proposal coming forward is for retail and this option needs to be allowed for in the document. It therefore should be acknowledged in the SPD that the Gatwick Road site is already predominantly occupied by retail businesses and this is likely to be the only viable use for the site moving forward, subject to, the necessary justification being provided in line with the national and local planning policy framework.</p> <p>The amendment of Figure 7, to remove the reference to the Core Business Zone, (and associated changes in the wording of Section 4.1) is required to ensure that the document fully accords with the guidance set out within the NPPF and earlier sections of the SPD, which states that (under Section 1.5) that the SPD does not seek to prescribe the types of uses that will be considered acceptable at Manor Royal. The Character Zones could simply be referred to as 'A' and 'B' if required to provide an area reference for the design criteria set out in Paragraphs 4.1.1 and 4.1.2.</p> <p>In terms of the reference of the Gatwick Road site as a 'Gateway' Site in Section 4.2 this should be removed. The site is not directly adjacent to the roundabout nor can it be easily seen from it (other than at a very oblique angle) and there is no justification or evidence provided for it to be considered as such.</p>	<p>Masterplan and does not relate to the vacancy of the site.</p> <p>Noted. CBC's position on a ""town centre first" approach to retail remains unchanged and text is not to be amended. Whilst the role of the trade counters in proximity to the Gatwick Road site, and the Gatwick parade area is recognised in providing small scale retail, retail uses are to be restricted, because of the impact on the town centre.</p> <p>The reference to the core business zone relates to the masterplan definitions and the operation of the existing area. It does not prescribe uses. Text to be clarified.</p> <p>Noted. The Gatwick Road site, by way of its prominent junction location and significant frontage, is considered by the council to justify its identification as a Key/Gateway Site. The site is crucial in marking an east west direction of travel from the roundabout and this is in line with the Masterplan work undertaken in 2010.</p>
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	<p>Key Development Sites 4.3.2 Thales Gatwick Road (D2)</p> <p>It is acknowledged (and welcomed) that the overly prescriptive policy wording, which provided site specific land use guidance, allocating the site for business use, has been removed to ensure that the wording generally respects the guidance within the NPPF (other than for the wider designation of the 'Core Business Zone' as detailed above).</p> <p>The changes made to the document (in line with Thales' previous representations) removing the reference to specific building heights / the dimensions of any new building on the site is welcomed and strongly supported.</p> <p>However, the site specific guidance contains a reference to a plan being provided (not currently included within the SPD) which will denote the exact position of a building and it's frontage on the site along with a 'set back' area (which presumably any proposal for the site would have to adhere to). This is strongly objected to for the following reasons.</p> <ol style="list-style-type: none"> 1. There is no opportunity for Thales to review the Council's specific location of the building on the site - The site specific Layout Plan has not been made available for consultation therefore Thales cannot properly consider whether the layout is actually achievable; 2. There is no justification that in practical terms a building can be accommodated in this location - there is no indication if the Council has employed an architect to understand if it will be either physically or financially (in terms of build costs) feasible to accommodate a building in that location and still ensure that the layout of the site, or that the proposed floor plates of the building are commercially viable and can be delivered; 3. There is no commercial evidence that a building can be 	<p>Support Noted.</p> <p>Support Noted.</p> <p>The text does not state a layout plan but specifies that changes to the illustration used are to be amended in the final document. There are no layout requirements or location specific requirements being made other than the 10m landscaping strip which acts as a set back. <i>The SPD will not include a layout plan. The text will be amended so it does not refer to it. There are no layout requirements or location specific requirements in the SPD other than the 10 m landscaping strip which acts as a set back"</i></p> <p>No plan is being produced.</p>

	<p>accommodated in this location - no evidence has been provided to understand where the Council has canvassed agents / developers /occupiers views as to the best location or configuration of the building to ensure that it can be used for a range of uses, to ensure the site is not blighted from coming forward; and</p> <p>4. The policy framework is still overly prescriptive i.e. if Thales or another party was to submit a scheme for the building in another location (because it was commercially viable to do so) it would be contrary to the guidance within SPD and therefore the site could be prevented from coming forward for development (contrary to the national guidance contained within the NPPF).</p> <p>The site is constrained due to its relatively small size and triangular shape; if and when a particular use is proposed it will require careful consideration of the location of the building to understand how to make the best possible use of the site. This is in order to maximise the amount of commercial development which can be accommodated on it (to help provide new jobs in the borough), along with ensuring that a sensible and commercially viable car parking / landscaping scheme can be accommodated.</p> <p>If the Council provides specific guidance in relation to the location of the building/the buildings frontage and denote a unspecified 'set back' strip of land (without any firm architectural or commercial advice) it will significantly reduce the developable area of this already constrained site and potentially sterilise the site and prevent it from coming forward for development.</p> <p>This is because in this difficult economic market (and indeed at any time) the location / size and shape of any commercial building is key to both maximising the level of development which can be accommodated on the site and whether or not it is commercially viable.</p> <p>Therefore, as set out above, the Layout Plan including the 'set back' strip</p>	<p>No specific location is proposed.</p> <p>No location is prescribed, other than the need for proposal to consider and reflect its gateway location.</p> <p>No location is prescribed. Following discussions, the council has met with Thales to consider the location of a building on the site and confirmed that it is not prescribing that this can only be in the southern corner of the site.</p> <p>This is not the only location a landmark building can be provided in, and discussions have been undertaken to demonstrate this.</p> <p>The SPD and subsequent discussions show that pre-application discussions are necessary and encouraged when exceptional circumstances may prevail. However the precise location of a building is not prescribed Noted and pre-applications have been ongoing and will continue to be offered regarding the site.</p> <p>The SPD seeks to deliver improvements</p>
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	should not be included within the SPD.	<p>across the Manor Royal environment, and provision of an appropriate level of landscaping is viewed as an important means of addressing a generally poor relationship between the private and public realms. The council would therefore wish to ensure that opportunities are fully explored through site layout and design to comply with the SPD requirements. Proposals will however be assessed on a case-by-case basis, and it will be for developers to provide robust justification to demonstrate reasons why landscape requirements cannot be met.</p> <p>Other restrictions have been removed regarding heights, set backs etc. However the landscaping proposals are required on the key site as a primary frontage to demonstrate an uplift in the environment. The landscaping is considered to be an important aspect in delivering this uplift. The landscaping mirrors that of the Thales, London Road site and is based on an assessment of surrounding development and the degree to which the landscaping forms a part of the frontage of the site. Thales has confirmed that landscaping would be provided in any redevelopment proposals but it is the degree of space at 10m that raises concern. Again this is considered appropriate but pre-application discussions will ensure liaison and evidence can support any proposals on a case by case basis.</p>
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	<p>Other Key Design Issues</p> <p>Thales has previously made clear its objection to the assumption that it can allow access to Crawters Brook from its site or that a building should be specifically designed to overlook it. This objection still stands.</p> <p>It should also be noted that the Gatwick Road site was previously a high-security List-X site and therefore none of these proposals can be considered without due regard to the security implications. If it was to revert back to that use it would be impossible to adhere to the Council's guidance on boundary treatment or frontages as it would conflict with the secure nature of the site. Only in the event of a new use coming forward on the site could relaxations be made, but this is not known at the current time.</p> <p>Furthermore, Thales has no intention of giving up any more of its land or to allow its boundaries to be breached, altered or amended in anyway. This is because the site is already relatively small and constricted the loss of anymore of the developable land is likely to prevent it from coming forward for development.</p> <p>Furthermore, the Council's requirement for a 10 metre 'landscaping zone' along the longest frontage of the site (320 meters) at Para 3.1.1, effectively sterilises a large proportion of the site from coming forward for development.</p> <p>The SPD will therefore prevent any development from coming</p>	<p>Noted. However the SPD aims to provide clarity to key issues and will be relevant when any type of development is considered. Whilst some exceptional circumstances may warrant certain security design principles to be enhanced and others reduced, this should only be considered at a pre-applications stage with full supporting information explaining why a development can not address these elements of design.</p> <p>Noted. Crawters Brook and related potential improvements offer an opportunity for a new building to have more integration with the brook and face onto both open space and Gatwick Road. Individual proposals and uses will need to consider this on a case by case basis.</p> <p>Noted. This has been discussed and can be considered on a case by case basis.</p> <p>)</p> <p>Noted. The SPD seeks to deliver improvements across the Manor Royal environment, and provision of an appropriate level of landscaping is viewed as an important means of addressing a generally poor relationship between the private and public realms. The council would therefore wish to ensure that opportunities are fully explored through site layout and design to comply with the SPD requirements. Proposals will however be assessed on a case-by-case basis, and it</p>

	<p>forward on approximately 3,200m2 of the Gatwick Road site, not making the best use of previously developed land (in line with national, and local planning policies and considerably devaluing the value of the site). This is made more problematic because the site is already relatively small and constricted. The loss of anymore of the developable land is likely to prevent it from coming forward for development.</p> <p>On this basis, Thales strongly objects to this policy requirement and asks that flexibility is built into the SPD to allow proposals for the site to be developed not only with design and landscaping issues in mind but also to ensure that any development is viable and that a blanket embargo is not imposed preventing large parts of the site from coming forward for development.</p>	<p>developers will need to provide robust justification to demonstrate reasons why landscape requirements cannot be met.</p> <p>The site area remains unchanged and other restrictions have been removed regarding heights, set backs etc. However the landscaping proposals are required on the key site as a primary frontage to demonstrate an uplift in the environment. The landscaping is considered to be an important aspect in delivering this uplift. Continued pre-applications are encouraged on a site by site basis.</p>
	<p>In terms of the improvements to the street frontage in the middle section of Gatwick Road, this requirement (made throughout the document) again is an aspiration which should not unduly burden development from coming forward at Gatwick Road, as it simply may not be viable for Thales' site to provide monies to try to address all the long term existing issues identified by the Council.</p> <p>This requirement (made throughout the document) ignores the fact that this environment was created largely by the imposition of the bus lane on this section of Road, which included a compulsory purchase of some of the land from the Thales site. It should be noted that the development by the Council of the bus lane involved Thales giving up some of its land. It is therefore unacceptable to Thales that it is the landowner which again is expected to contribute further to rectifying a situation which has been caused by the Council's previous initiative/policy.</p> <p>In addition to the items addressed above, the guidance asks that site D2</p>	<p>No monies are required other than the adopted s106 payments currently in the S106 obligations SPD. This SPD does not request any additional funding.</p> <p>Noted. WSCC as the highways authority implemented the Fastway project and the land negotiations would have been undertaken at this time. This does not alter the landscaping requirement as part of the SPD. Text to remain unchanged.</p>

	<p>improves the biodiversity of Crawters Brook as well as the access to it. The landowner of Crawters Brook is the Council. It is unacceptable to expect the cost to be borne by the owner or developer of the Thales site just because it happens to be adjacent to it, therefore has the Council secured any funding to facilitate its improvement?</p> <p>For the avoidance of any doubt, there should be no specific design criteria for this site in relation to Crawters Brook (including the reference to active frontages facing onto it) and if required it should be discussed at the time a planning application is submitted only.</p>	<p>Noted. The Crawters Brook proposals are not requesting funding or input from Thales with regard to bio-diversity, however the bio-diversity of any proposals should have regard to Crawters Brook. Documents to be clarified</p> <p>It is the intention of the SPD and Public Realm Strategy to maximise opportunities for improved accessibility across the public realm. It is however recognised that some operators may have specific site requirements that may not reflect the requirements of the SPD. In such cases, proposals should demonstrate fully reasons as to why the SPD objectives cannot be achieved, and proposals will be considered on their individual merits through the planning application process.</p>
	<p>In terms of the improvements On Page 17 the Council sets out its general requirements in terms of the boundary treatment of sites across Manor Royal. It needs to be remembered that the primary function of security fencing is security. This is determined more by what goes inside a plot than the surrounding area and could (for example in the case of the Thales business) be determined by external influences such as UK Government. The planting of trees/shrubs along boundary fences can make it easier for intruders to gain access or be hidden from view. Therefore, some of these proposals may be impractical from a security point of view.</p>	<p>Noted. Site specific to be considered at pre-application stage.</p>
	<p>Lastly, the SPD refers (on page 18) to use of "enhancement lighting". It</p>	

	<p>should be noted that this will bring additional costs both in development and energy costs and could prevent development from coming forward on the site. Therefore will funding to meet this aspiration be available from the Council and are any details available?</p>	<p>Lighting is a way of enhancing the external appearance of buildings and the SPD aims to encourage innovative and improved design. It does not impose lighting as an additional requirement nor does it prescribe useage. Funding will not be granted for any lighting within development boundaries.</p>
	<p>Conclusion</p> <p>It is vital that the continued development and re-use of the land on Manor Royal is not blighted or hampered by design aspirations which are overly prescriptive, unviable, unrealistic, restrictive, or otherwise unattractive to developers.</p> <p>Thales has previously expressed its concerns and remain of the view that the SPD as drafted would be detrimental to the site called therein as D2 and would render it incapable of being redeveloped for many years, meaning a loss of employment opportunities and loss of revenue for the Local Authority. It seems a most inappropriate course of action in these harsh economic times when competition for sites is at its highest and investment decisions are subject to intense financial scrutiny. The financial impact of many of the aspirations in the SPD would be a deterrent to development.</p> <p>Overall, as stated in our previously submitted representations, Thales supports the Council's initiative to improve Manor Royal. However, Thales feels that both the draft SPD and Public Realm Strategy are not needed or required and will ultimately prevent development from coming forward at Manor Royal.</p> <p>If the Council is determined to pursue this course of action and adopt these documents they must be radically changed to ensure that both provide a supportive and flexible design approach to ensure that it does</p>	<p>Noted. However the SPD aims to provide clarity to key issues and will be relevant when any type of development is considered. Whilst some exceptional circumstances may warrant certain principles to be enhanced and others reduced, this should only be considered at a pre-applications stage with full supporting information explaining why a development can not address these elements of design.</p> <p>At the recent meeting with Thales and telephone conversations it has been noted that they feel that the SPD will further restrict potential uses, however the Council considered that land uses are now not restricted other than retail and would be considered on a case by case basis. The improvements to the landscaping and aesthetic of the site are considered to be NPPF compliant and do not over burden investors, given that they now focus on improving the look and feel of the site and how</p>

	<p>not prevent new commercial development from coming forward on Thales' site at Gatwick Road site. We trust that these representations will be duly considered and want to highlight that this is an extremely important matter for Thales and the impact of the Manor Royal Design Guide SPD on Thales should not be underestimated.</p> <p>We therefore hope that Members defer adopting the document until it has been properly debated as to whether it is actually required (particularly in these difficult economic times) as it could prevent development from coming forward or (without prejudice) give Officers more time to consider the document in light of these representations so it can be amended appropriately.</p>	<p>the frontages are of high quality.</p> <p>Consultation with landowners has been ongoing since December. The latest version was produced in April and a meeting has taken place in June. A further delay is therefore not considered appropriate.</p>
<p>Jones Lang Lasalle on behalf of Thales</p> <p>Comments specific to the Public Realm Strategy</p>	<p>Officers provided a high degree of comfort at the meeting that the Council wishes to promote development on the Gatwick Road site and that if proposals were to come forward, which could not meet the requirements, set out in the document that the Council would take a pragmatic and flexible approach in determining the proposals. On the basis of the assurances provided at the meeting, it is understood that Officers are in the process of revising the SPD to take into account some of the issues raised by Thales albeit, the document is not available to review at the current time.</p>	<p>Note. Please see detailed sections for text changes.</p>
	<p>Since the meeting, Thales was given the opportunity to submit further representations to the document and an initial summary of these were provided in an email dated 19th June 2013 setting out the main concerns which Thales has with the document, followed by this written representation.</p>	<p>Noted. Final representations were received on the 25th June to feed into the cabinet report.</p>
	<p>Thales' concern is that the Council's approach will still blight the site for years to come, undermine the financial case on which it based its decision to invest in Manor Royal, and could potentially hamper its ability</p>	<p>Noted</p>

	<p>to make future investments into its business, including at Manor Royal.</p> <p>Thales genuinely and robustly questions some of the stated assumptions and aspirations. There seems to have been insufficient investigation to truly test some of the ideas and aspirations being put forward from a financial viability perspective as well as from the point of view of objectively measuring the true value of so-called benefits (many of which appear subjective) against cost, with no assessment of a financially driven business case.</p> <p>In short, as set out in the representations to the Manor Royal Design Guide SPD, Thales feels that both documents are not needed or required and will ultimately prevent development from coming forward at Manor Royal.</p> <p>If the production of this Strategy is still pursued by the Council it must be radically changed and these representations therefore focus on the Strategy and set out the areas upon which Thales still has major concerns.</p>	<p>At the meeting with Thales and telephone conversations it has been noted that they feel that the SPD will further restrict potential development. However the Council considers that land uses are now not restricted other than retail (based on impact assessment) and therefore any development would be considered on a case by case basis.</p> <p>The improvements required by the SPD and the public realm are to deliver an uplift to the image and aesthetic of the business district and are considered to be NPPF compliant and therefore do not over burden investors, given that they now focus on improving the look and feel of the area whilst providing more clarity over key elements of design.</p> <p>The Manor Royal Design Guide SPD has been identified by the council and Manor Royal Business Group as a key mechanism to help achieve objectives to improve the overall Manor Royal environment and attract investment. The requirements of the SPD are in place to help achieve these improvements, though it is recognised that in exceptional circumstances, development may not be able to meet the SPD objectives. In these specific instances the council would require development to demonstrate at the pre-application/planning application stage reasons as to why the SPD recommendations cannot be achieved.</p> <p>It should be recognised that the role of the</p>
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	<p>The Main Issues that will prevent the Site from being developed</p> <p>The reference to the onus on the private sector to provide the improvements to Manor Royal</p> <p>Paragraph 5 states that The Design Guide SPD and the Public Realm Strategy will build on a consensus process between private and public sectors, and do this by, providing design guidance in the SPD and Public Realm Strategy.</p> <p>Whilst of course Thales support improvements at Manor Royal generally, it is concerned that prescriptive policy guidance/requirements, contained within the document potentially could prevent development from coming forward on the site rather than encourage vacant units to be occupied or sites to be built upon for new development.</p> <p>Therefore it must be made clear that the guidance is aspirational only and will not be strictly applied particularly if it will make new development unviable.</p>	<p>The SPD & public realm strategy are proposed to deliver and ensure a high-quality environment across the Manor Royal Business District is delivered. Whilst it is recognised that the current economic climate represents a constraint to development, the SPD seeks to plan positively to attract inward investment. As such, the council will require development to have regard to the guidance of the SPD, but will work closely with developers through the planning process, and will consider individual circumstances on a case by case basis.</p> <p>Initial cost assessments for the schemes have been undertaken at this stage but additional feasibility will be undertaken when a scheme is ready to be considered. These funding elements are not considered appropriate to be included within the document but have formed part of the assessment process. Funding from developers for Public Realm improvements are</p>

		as currently stand under the adopted S106. Noted
	<p>Reference to Thales Gatwick Road (D2) being a Key Development Site</p> <p>In terms of the detailed guidance contained within Proposal 2, it would be helpful if the supporting text acknowledges some of the constraints facing the redevelopment of the site. That is, the supporting text should be set out in respect to the Council's acknowledgment/ understanding that over the last few years it has been difficult to attract a potential occupier and/or purchaser for the site.</p> <p>On this basis, Thales strongly disagrees with the description of the site and the requirements for its redevelopment in paragraphs 75 to 78.</p>	<p>The site is considered to be gateway and is a key development site by virtue of its prominence on the Gatwick road and the definition of the eastern side of Manor Royal. The site has been defined as a key opportunity since 2010 within the DPS and Masterplan and should remain so.</p> <p>Text is not to be changed in the strategy as this does not highlight any similar constraints for other sites. However the wider economic recession and decline in potential development is addressed across the SPD and Strategy, which recognise the economic issues related to delivery. This has been addressed by removing a number of constraints such as set backs, building heights etc.from the original documents.</p>
	As stated above the site is not considered a 'Key' or Gateway site and it is only visible by oblique view form the roundabout.	See SPD response. No change
	It should also be noted that the site itself was previously a high-security List-X site and therefore none of these proposals can be considered without due regard to the security implications.	See SPD response. No change
	As set out in the representations to the Manor Royal Design SPD, the policy framework should not be prescriptive regarding planting along the frontage. For example, the existence of trees and shrubs along a security fence can make it easier for intruders to gain access or to be hidden from view. As experts in the field of security, Thales would be pleased to	Noted. The Council has worked closely with Thales throughout the document drafting process, and has made changes where it has deemed these appropriate to ensure that so far as possible the document reflects Thales

	<p>advise the Council further on this point.</p> <p>Ultimately if the site area is blighted by this overly prescriptive policy framework, by being reserved for landscaping schemes which may never come forward, the site will remain vacant and undeveloped for years to come, as it will simply not be financially viable to do so.</p> <p>Conclusion</p> <p>Overall, as stated in our previously submitted representations, Thales supports the Council's initiative to improve Manor Royal as a whole and its site at Gatwick Road. However, as set out in the representations to the Manor Royal Design Guide SPD, Thales feels that both documents are not needed or required and will ultimately prevent development from coming forward at Manor Royal.</p>	<p>concerns whilst ensuring conformity with the NPPF and working towards the objective to improve the overall environment at Manor Royal.</p> <p>The council and Manor Royal Business Group recognise that the Manor Royal SPD and Public Realm Strategy represent important mechanisms to help achieve the wider objective to improve the Manor Royal environment. The council has amended both documents in light of consultation feedback, and consider both documents to be NPPF compliant. This issue, and all others mentioned, have been discussed in detail with Thales at a meeting on the 17th June and subsequently on the phone with their agents.</p> <p>Noted and discussed. In responding to Thales representations relating to the SPD, the council has made clear that flexibility will be afforded if required by a specific site proposal, though the onus will be on the proposal to demonstrate in full reasons as to why the requirements of the SPD cannot be met.</p>
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