

STATEMENT OF CONSULTATION

APPENDIX 1

Early Consultation - Core Strategy Review

PART 1

Who was invited to make Representations

PART 2

Representations & Responses



PART 1

Who was invited to make Representations

The following were invited to make representations to this consultation:

1 Golding Close, Maidenbower	5 Wellington Close, Pound Hill	BAA
10 Priestcroft Close, Gossops Green	57 Selsey Road, Crawley	BAA Gatwick
10 Rosamund Road, Furnace Green	6 Birch Lea, Tinsley Green	BAA Gatwick Public Affairs
11 Drake Park	6 Blaxett Road, Maidenbower	BAA Lynton
114 Malthouse Road, Southgate	6 Farmleigh Close, Pound Hill	BAA Plc Gatwick
12 Matthews Drive, Maidenbower	6 Framleigh Close, Pound Hill	Babcock King Wilkinson Ltd
12 Theydon Close, Furnace Green	62 Worth Park Avenue, Pound Hill	Baptist Women's Fellowship
13 Aldingbourne Close, Ifield	7 Blackcap Close, Southgate West	Barratt Southern Counties
13 Doncaster Walk, Furnace Green	7 Briars Close, Langley Green	Barton Willmore Planning
13 Kingswood Close, Tollgate Hill	7 Hastings Road, Pound Hill	Barton Willmore Planning
16 Maple Close, Langley Green	8 Aldingbourne Close, Ifield	Barton Wilmore Partnership
17 Cranbourne Walk, Furnace Green	80 Gainsborough Road, Tilgate	Bell Cornwell Partnership
2 Avingling Close, Maidenbower	81 North Road, Three Bridges	Bellway Estates
2 by 4 ARTISTS	81 North Road, Three Bridges	Bellway Homes
2 Linden Close, Furnace Green	82 North Road, Three Bridges	Berts Cottage, Donkey Lane
2 Richfield Place, 12 Richfield Avenue	9 Baker Close	Berts Cottage, Donkey Lane
2 Ruspers Keep, Ifield	9 Jersey Road, Cottesmore Green	Bewbush Barn Church
20 Fernhurst Close, Ifield	Adur District Council	Bewbush Community Forum
216 Ifield Road, West Green	Ahmadiyya Muslim Association	Bewbush Primary School
23 Peterborough Road, Tilgate	Ahmadiyya Women's Muslim Association	Bloomfields Ltd
24 Coppice Walk, Three Bridges	(LAJNA)	BOC Edwards
25 The Pasture, Pound Hill	Air 2000 Ltd	BOC Gases
29 Lady Margaret Road, Ifield	Alfred McAlpine Developments Ltd	Bond Pearce Solicitors
29 Tilgate Way, Tilgate	Alliance - Environment and Planning Ltd	BOP (Bewbush Older Peoples) Group
3 Canterbury Road, Tilgate	Ancient Monuments Society	Bovis Homes Ltd
31 Mount Close, Pound Hill	Architectural Heritage Fund	Bowyer Planning Ltd
32 Shipley Road, Ifield	Arlington Development Services	British Airways World Cargo
35 Parham Road, Ifield	Arriva	British Airways World Cargo
37 Sandringham Avenue,	Arts Council of England	British Gas plc
39 Marshall Road, Maidenbower	Arun District Council	British Horse Society
4 Kenmara Close, Three Bridges	Ashton Stamps	British Telecommunication (RPS)
4 Keymara Close, Three Bridges	Atlantic House	British Wind Energy Association
44 St Catherines Road, Pound Hill	B & CE Benefit Schemes	Broadfield East Junior School
48 Arden Road, Furnace Green	B & CE Benefit Schemes	Broadfield Link Group

Broadfield Mosque	CPRE Sussex	Crawley-Gatwick Church of Christ
BT Cellnet (O2)	Crawley and Gatwick Chamber of Commerce	Crown Estates
BTCV (National Office)	Crawley Campaign Against Racism	Crown Estates Commission
Buddhist Group	Crawley Careers Centre	Cyclists Touring Club
Burleigh Infants	Crawley Chamber of Commerce	David Wilson Homes South East
Burstow Parish Council	Crawley Connexions Centre	Davies Associates (for English Partnerships)
CAA (Civil Aviation Authority)	Crawley CVS	Deerswood Lower & Upper Schools
CAA Safety Regulation Group	Crawley Down Junior	Defence Estates (MOD)
Cable and Wireless Plc	Crawley Ethnic Minority Forum	Deloitte & Touche LLP
CADIA	Crawley Ethnic Minority Partnership (CEMP)	Department for Transport
Campaign for Real Ale	Crawley Festival Committee	Department of Constitutional Affairs
Canadian & Portland Estates Plc	Crawley Friends Housing Association	Department of Health
CBRichard Ellis	Crawley Gateway Club	Department of Trade and Industry
CBRichard Ellis	Crawley Horticultural Society	Department of Transport Airports Policy
CDC2020 plc	Crawley Islamic Cultural Centre & Mosque	Department of Transport Airports Policy
CDHA/Hyde	Crawley Lawn Tennis Club	Dept for Culture, Media and Sport (DCMS)
Central Electricity Generating Board	Crawley Library	Dept for Education and Skills
Charles Planning Associates	Crawley Lioness Club	Dept of Environment, Food and Rural Affairs (DEFRA)
Charlwood Parish Council	Crawley Lions Club	Derek Horne Associates
Chichester District Council	Crawley Multiple Sclerosis Society	Desmond Anderson School
Children's Operations	Crawley Museum Society	Development Planning Partnership
Chris Thomas Ltd	Crawley Open House	DevPlan
Church of St Edward the Confessor RC	Crawley Patient Care Group	DfT - Rail Group
Citizens Advice Bureau	Crawley Pensioners Action Group	Dialogue
Civic Trust	Crawley PHAB Club	Diamond Enterprise Hub
Civil Service Pensioners Alliance (Crawley Group)	Crawley Police Station	Diocesan Board of Finance
Clean Glo Ltd	Crawley Police Station	Dolphin Telecommunications Ltd
Cloth Store	Crawley Primary Care Trust	DPDS Consulting Group
Colgate Parish Council	Crawley Pupil Referral Unit	DPDS Consulting Group
Colgate Parish Council	Crawley Rotary Club	Drivas Jonas
Community Health Authority	Crawley Round Table	East Sussex County Council
COMPASS	Crawley Scout Council	ECO Island
Connaught Partnership Ltd	Crawley Sure Start	Ek Awaz (One Voice)
Consignia (Property Holdings)	Crawley Taxi Association	Elekta Ltd
Council for British Archaeology	Crawley Town Twinning Association	Elim Pentecostal Church
	Crawley Youth Centre	

Elim Pentecostal Church
Employment Services Job Centre Plus
English Heritage
English Partnerships
Environment Agency
Environment Agency
Equality and Human Rights Commission
Ericsson
Eurobell (Sussex) Limited
Fairview Homes
Fairway Infants
Family Health Services Authority
Federation of Sussex Amenity Societies
First Choice Holidays and Flights Ltd
Flat 5 Glynde House, Green Lane
Forestfield & Shrublands Cons. Area Adv Ctte
Forestry Commission
Forge Cottage, Balcombe Road
Forgewood Residents Association
Freehold Parish
Friends Ivory and Sime Property
Frogmore Developments
Fusion Online Limited
Gatwick Airport Limited
Gatwick Area Conservation Campaign
Gatwick Cargo Handling Ltd
Gatwick Express
Gatwick Express Limited
Gatwick Guest House Association
Gatwick Hotels Association
Gatwick Hotels Association
Gatwick Police
Gatwick Police
General Aviation Awareness Council
George Wimpey Southern Ltd
Gerald Eve

GlaxoSmithKline
Global Mapping
Gossops Green Primary
Government Office for the South East
Go-Via (New Southern Railway)
Great Western
Greenfields Tenants and Lessees Association
Grosvenor
Groundwork Foundation
Grove Cottage, Poles Lane
Guide Dogs for the Blind
Guinness Trust Housing Association
Guinness Trust
Guinness Trust
Guinness Trust
GVA Grimley
Hazelwick School
Health and Safety Executive
Hear This
Henry Smith Chartered Surveyors
Henry Smith Chartered Surveyors
High Weald AONB
High Weald AONB Office
Highways Agency
Hillread Homes (Sussex) Ltd
Hillreed Developments Limited
Hindu Nayee Community
Holy Trinity Secondary School
Home Builders Federation
Home Office
Horley Crawley Countryside Management
Project
Horley Town Centre Council
Horley Town Council
Horsham District Council
HSBC

Hyde Housing Association
Iceni Projects Limited
ICS Inflight Cleaning Services Ltd
ICTS (UK) Limited
Ideal Homes (Southern) Ltd
Identex Ltd
Ifield Community College
Ifield Village Conservation Area Advisory
Comm.
Industrial Chaplain for Crawley
Inflight Cleaning Services Ltd
Inner Wheel Club
Job Centre Plus
Jones & Company
Jones Day
Juniper Road Residents Group
Keep Rusper Green
Keniston Housing Association
Kenneth Boyle Associates
King Sturge
King Sturge
Kingdom Hall
Laing Homes c/o Barton Willmore
Laing Homes South West Thames
Land Securities PLC
Land Services Trillium
Landmark Information Group Ltd
Langley Green Health Centre
Langley Green Primary School
Langley Lane Residents Association
Leacroft Medical Practice
Learning Skills Council
Level
Lichfield Associates
Lichfield Planning LLP
London Gatwick Airport

Lovell White Durrant
Lowfield Farm, Charlwood Road
LSG Skychefs
Maidenbower Baptist Church
Maidenbower Residents Association
Maidenbower Residents Association
Malcolm Judd & Partners
Manor Green College
Manor Green Primary
Manor Royal Business Association
McCarthy & Stone (Assisted Living) Ltd
McCarthy & Stone/The Planning Bureau
McLean Homes South East Limited
Mental Health Sussex, Wealds & Down NHS
Trust
Metrobus
Mid Bewbush Community Association
Mid Sussex District Council
Miller Homes
Milton Mount Primary School
Milton Mount Tenants and Lessees
Association
Mind in Brighton and Hove
Mitsui Babcock Energy Ltd
Moat
Moat Housing Group
Mole Valley District Council
Monarch Airlines
Montefiore Institute
Morley Fund Management
Mr Andrew Hair, Federation of Sussex
Amenity Societies
Mr Brian Holden, West Sussex Fire & Rescue
Service
Mr Chris Whitwell, Friends, Families and
Travellers

Mr David Edwards, Taylor Wimpey Strategic
Land
Mr Farakh Jamal, Crawley Islamic Cultural
Centre
Mr Keith Greenleaves, PHNRA
Mr Keith Parsons, Central Crawley
Conservation Area Ctte.
Mr Mark Fisher, The Lawn Tennis Association
Mr Matthew Church, Croudace Homes Ltd
Mr Michael Fearn, Shire Consulting
Mr Nicholas Ide, Batcheller Thacker
Mr Pete Crawford, Gatwick Greenspace
Crawley
Mr Peter Smith, Cycling Touring Club (CTC)
Mr Phil Hull, RPS
Mr Richard Lemon, Roger Tym & Partners
Mr Robert Fletcher, Ian Baseley Associates
Mrs Eunice Clement, Crawley Museum
Society
Mrs Pam Ruel, Forestfields & Shrublands
Cons. Area Ctte
Ms Abigail Raymond, C/O Mrs Phillipa Aitken
Ms Amy Jone, DPP
Ms Charlotte Yarker, Montagu Evans
Ms Rita Burns, Gatwick Airport Limited
Ms Sarah Hamilton,
Muslim Community
Nathaniel Lichfield and Partners
Nathaniel Lichfield and Partners
Nathaniel Lichfield and Partners
National Car Parks
National Grid
National Housing Federation
National Playing Fields Association
National Power Plc
National Rail Strategy Division (DfT)

National Travellers Action Group
National Trust
Natural England
Network Rail
New Life Church
Newdigate Parish Council
Northgate Primary School
Northgate Primary School
Oaklands, Rusper Road
Office of Government Commerce
Old Bewbush Community Association
Orange Personal Communications Ltd
Oriel High
Our Lady Queen of Heaven Catholic Primary
School
Outreach 3-Way
Palace Street Investments
Parker Dann
Parkfire Communications
Pasta Reale Ltd
Paymaster (1836) Ltd
Paymaster Ltd
PB, Queen Victoria House
Peacock & Smith
Pegasus Planning Group
Persimmon Homes (South East) Ltd
Persimmon Homes South East
PH2 Planning Limited
Planning Perspectives LLP
Podium
Pound Hill Community Association
Pound Hill Infant School
Pound Hill Junior School
Pound Hill Residents Assoc
Powergen Plc
PPP

Pre School Learning Alliance
Pre School Playgroups Association
Public Art Development Trust
QSR Development Ltd
Ramblers Association
Ramblers Association (North Sussex Group)
Ramree, Forgewood
Rapleys
RDJW Architects
Reigate and Banstead Borough Council
Renaissance London Gatwick Hotel
Rights of Way - Planning Inspectorate
Royal British Legion/Crawley Blind Bowlers
Royal Institute British Architects RIBA
Royal Mail
Royal Mail Group
Royal Mail Property Holdings
RPS
RPS Planning Transport and Environment Ltd
Rusper Parish Council
Rydon Homes Ltd
Sainsbury's Supermarkets Ltd
Sandalwood, Rusper Road
Savills
Savills
Savills Ltd
Scotia Gas Networks
Scottish Widows Investment Partnership
SE England Conservancy (Forestry
Commission)
SEEDA (South East England Development
Agency)
SEERA
Seymour Primary School
Shared Intelligence
Shelter

Showmens Guild of Great Britain
Siri Guru Singh Saba
Slaugham Parish Council
Sostar Juth Nayee
Sostar Juth Nayee Post Office
South Crawley Baptist Church
South East Arts Board
South East Coast Ambulance Service
South East England Regional Assembly
(SEERA)
South East Water
South England Institute of Tamil Culture
Southern Housing Group
Southern Water
Southern Water Services
Southgate Primary School
Sport England
St Alban's Gossops Green
St Andrews Primary School
St Andrews Vicarage (COE)
St Barnabas COE
St John the Baptist C of E Church
St Leonards Church
St Margarets CE First & Middle School
St Margarets Primary School
St Martins Property Corporation Ltd
St Mary Magdalene COE
St Marys COE
St Nicholas COE Worth
St Peters COE
St Peters COE
St Richard of Chichester
St Wilfrids Catholic Comprehensive School
Stevens Vauxhall
Stiles Harold Williams
Strutt & Parker

Surrey and Sussex Health Care NHS Trust
Surrey and Sussex NHS Trust
Surrey County Council
Surrey County Council
Sussex Biodiversity Partnership
Sussex Building Control
Sussex Enterprise
Sussex Partnership NHS Trust
Sussex Police
Sussex Rural Community Council
Sussex University
Sussex Weald & Down NHS Trust
Sussex Wildlife Trust
Sustrans
Sutton and East Surrey Water Plc
SW Thames Regional Health Authority
Swaminarayan Hindu Mission
T Mobile
T Mobile
TAG
Tandridge District Council
Tetlow King
Thales Communications UK
Thales Defence Systems Ltd
Thames Water Plc
The British Wind Energy Association
The Brook Infant School
The Coal Authority
The Crawley Foyer (London & Quadrant
Housing)
The Gables Nursing Home
The Gatwick Grove, Poles Lane
The Gypsy Council
The Hilltop Primary School
The Housing Corporation
The Law Courts

The League of Friends of Crawley Hospital
The Littman Partnership
The Mill Primary School
The National Association of Gypsy Women
The Oaks Primary School
The Samaritans
The Theatres Trust
Thermopol Ltd
Thomas Bennett Community College
Thomas Bennett Youth Wing
Three Bridges First Church
Three Bridges Infant School
Three Bridges Spiritualist Church
Tilgate Lane Association
Tim Searl
Tinsley Lane Residents Association
Tokyo Electron Europe Ltd
Tower Housing Association
Transco
Traveller Advice Team (Community Law Partnership)
Travellers Consultancy Service
Trinity United reformed Church (UFC) Ifield
Trinity URC
Turley Associates
Turners Hill Parish Council
Twentieth Century Society
Unilever UK Foods
Unit 12, Kingsland Court
University of the Third Age
URC Church Pound Hill
Valuation Office
Varian Medical Systems (UK) Ltd
VEH Eng Consultancy
Vent-Axia Ltd
Vernier Ltd

Virgin Atlantic Airways Ltd
Virgin Travel Group Ltd
Vodafone Limited
Waterfield Primary School
Wedgewood, Farthing Hill
West Green Baptist Church
West Green Primary School
West Sussex Careers
West Sussex County Council
West Sussex Health Authority
West Sussex Library Service
West Sussex PCT
West Sussex PCT (Crawley)
West Sussex Social Services
Western Sussex Primary Care Trust
Westfield
White and Sons
White Young Green
Wildfowl and Wetlands Trust
WM Reed Publishing Ltd
Womens National Commission
Woodhurst, Balcombe Road
Woodhurst, Balcombe Road
Woodlands Trust
Woolf Bond Planning
Worth Conservation Area Advisory Committee
Worth Parish Council
Worth Parish Council
Worth Way Volunteers
Worthing Borough Council
Worthing Valuation Office
WRVS (Womens Royal Voluntary Services)
WSDAAT

PART 2

Representations & Responses

The Council can only consider comments by respondents who provide their names and contact addresses. In line with the Council's Public Sector Equality Duty, the Council will not accept representations, objections or comments that are deemed to be inappropriate, offence or racist. In general terms, a racist representation is one which includes words, phrases or comments which are likely:

- to be offensive to a particular racial or ethnic group;
- to be racially abusive, insulting or threatening;
- to apply pressure to discriminate on racial grounds;
- to stir up racial hatred or contempt.

Any objections and comments that have been deemed to be inappropriate, offensive or racist have been removed.

**SUMMARY OF REPRESENTATIONS RECEIVED
AND OFFICERS' RESPONSES**

TOPIC PAPER 1 – VISION AND OBJECTIVES

Mr John Brindley
Respondent Ref: 146704
Bellway Homes

Representation Summary: We support the Council's approach in terms of the uncertainty over the North East Sector and the need to plan for the uncertainty including the identification of sites beyond the Borough boundary. We support Scenario 1 and Scenario 2, which recognise that land beyond the Borough boundary may be required if Crawley is to meet its sub-regional function. The acknowledgement in the Crawley 2025 vision that two further neighbourhoods may have been developed/under construction is also supported.

Officer Response: Support noted

Mrs Pippa Aitken
Respondent Ref: 147710
CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: Reference is made to the New Town and neighbourhood principle continuing to be adopted. In the HCA's view, this approach should also include reference to achieving sustainable communities. This may mean that additions to existing neighbourhoods, which reinforce their sustainability credentials through, for example, enhanced critical mass to support existing services, or the provision of new services, can demonstrate that they still accord with the New Town and neighbourhood principles, whilst not necessarily achieving a neighbourhood scale.

The HCA understands the current uncertainty surrounding the future development of the North East Sector (in which it has a major landholding interest). Notwithstanding such uncertainty, it is the HCA's view that the Borough Council must positively plan for such. It is considered that the Borough Council should explicitly acknowledge the need to work with adjoining authorities to consider how best to accommodate housing within the sub-region.

Further comments provided on housing developments beyond the borough's boundaries, contingencies, and providing flexibility over the longer term.

Further comments provided on housing developments beyond the borough's boundaries.

Officer Response: The Council acknowledge the uncertainty regarding the delivery of the North East Sector. This is one factor that ensures the Council will continue to work in conjunction with neighbouring authorities and address sub regional matters through the LDF process. Comments regarding contingency are noted.

Mr Andrew Gale
Respondent Ref: 147975
Drivers Jonas (on behalf of Universities Superannuation Scheme)

Representation Summary: USS agrees with the approach which favours a combination of the sub regional focus and the CBC focus scenarios as it agrees it should ensure the town's growth. USS encourages the Council with its vision to adopt a flexible approach to employment provision both within and outside of the town centre to allow opportunities for job creation during this uncertain economic climate

Officer Response: The approaches advocated are noted. However, in line with the sequential approach, development opportunity sites within the Town Centre should be prioritised.

**Mr Peter Minshull
Respondent Ref: 148635
Highways Agency**

Representation Summary: Support the Council's decision to ensure development is located in the most sustainable locations and that such development is supported by the appropriate sustainable transport infrastructure. With regards to the scenarios, the HA would wish to take part in any early partnership working.

The HA consider that the Transport Strategy should also be a key part of the evidence base for this topic area as well. To this end, they would wish to discuss the strategy at the earliest opportunity to ensure that the Strategic Road Network is fully considered.

The HA has concerns about the references to further Fastway development being predominantly developer funded and the potential funding gap that could occur. The HA recommend that alternative sources of funding are identified as well.

In terms of the options put forward, the HA considers that a hybrid option is likely to be the most suitable. There will need to be elements within the final strategic option that enable/facilitate Crawley to function as a key part of the South East and for Crawley to work with neighbouring authorities.

Officer Response: The HA will be engaged at all stages in the formulation of the Core Strategy and Transport Strategy. Infrastructure provision and funding will be considered at Preferred Strategy stage. The scenario approach advocated is noted.

**Mrs Barbara Childs
Respondent Ref: 148734
Horsham District Council**

Representation Summary: HDC understands CBC's preferred scenario but does not wish to see the needs and issues identified in the South East regional focus scenario not being given due consideration in the plan making process. It supports the approach of utilising opportunities within the borough boundary in the first instance, where appropriate.

Would like a commitment and appropriate emphasis on partnership working with the adjoining local authorities explicitly set out in future stages of the CSR.

Disappointed that there is no reference to collaborative working when the possibility of development outside the Borough Boundary is raised in TP1, the paper from which the others flow.

Strongly emphasise the need for collaborative, clear and joined up approach in the preparation of Core Strategies in North West Sussex. This will contribute to the deliverability of any development options that the Borough Council may wish to explore, outside of its administrative boundary and in line with PPS12. West of Bewbush JAAP is seen to be an excellent example of this.

Encourage strong links between the Core Strategy Review and the Sustainable Community Strategy.

Officer Response: The Council is already collaborating with neighbouring authorities on several key pieces of evidence for the Core Strategies. Further direction regarding joint authority working will be provided at Preferred Strategy stage and the Council will continue to engage fully with neighbouring authorities throughout the formulation of the Core Strategy and its evidence base.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: The statements here are all suitable, but could refer to any town. We would like the original vision for Crawley, as a town within the countryside, to be implemented and maintained. In terms of scenarios, the position CBC is taking (a mix of scenarios 2 and 3) is probably appropriate, as dialogue with other authorities seems essential, particularly as their housing could be put on Crawley's doorstep. This position is however a 'catch 22' as Scenario 2 involves an acceptance that to meet housing targets and continue the neighbourhood principle, development beyond the town boundary is inevitable. This would remove the vision of a town within countryside. Should the North East Sector fail to come forward, IVCAAC would favour a scenario that acknowledges the limited availability of land at Crawley, and outlines that the South East Plan target cannot be met.

Officer Response: The approach advocated is noted. Should the North East Sector remain unavailable the Council will need to consider what other options are available to meet the South East Plan requirements and what, if any, contingency arrangements should be put in place. However, the Council would want to ensure that, whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: Strategy should be a combination of sub-regional and Crawley Borough.

Officer Response: Noted

Miss Claire Tester
Respondent Ref: 149286
Mid Sussex District Council

Representation Summary: Given the Borough's role in the sub-region and the interrelationship of the Borough with adjacent local authorities a scenario that acknowledges this would seem the most appropriate.

Officer Response: Noted

Mr Nicholas Eyles
Respondent Ref. 149690
Palace Street Group

Representation Summary: Surely you have just done all this finishing in 2007. Why do it all again in these difficult Economic times? If it has to proceed:

1. Could the documentation not be much shorter and far less repetitive - say each subject limited to 2 sides of A4.
2. Could the conclusions allow much more flexibility in terms of use and delivery to accommodate changing circumstances. Who knows what will be appropriate in 2105 or 2020. The best towns in the UK have matured on a "higgledy piggledy" basis over the last 2000 years rather than being uber planned.

Officer Response: Noted. Notwithstanding the work done to develop the Core Strategy adopted in 2007, the Council is expected to review its plans to address the policies now contained in the South East Plan.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: I do not accept that CBC should sacrifice green space areas in Crawley for further housing, though if appropriate road infrastructure and services are provided, I see no problem in the continuation of the neighbourhood principle in the peripheral areas beyond the current Crawley boundary to the east and west of Crawley. However, Crawley will still need 'room to breathe'. A substantial upgrade of Crawley Technical College is essential, though talk of a university is presumptuous. Crawley is not a focus of scholarship, and never will be.

Officer Response: The approach advocated is noted. The importance of existing and future open space is recognised and policies will accordingly be included in the Core Strategy Review.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: Potential direction is considered reasonable, although the Borough's role in the wider development of the South East region should continue to be borne in mind.

Officer Response: Noted.

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. Do you agree with the proposed Topic Areas?

In formulating the Regulation 27 Proposed Submission care will be needed to ensure that these extensive topics are covered in a clear and succinct spatial strategy that focuses on growth and implementation, in accordance with national policy and the South East Plan. Consideration could be given to producing a joint Core Strategy with Horsham District

and perhaps also Mid Sussex, to cover the Gatwick Diamond area (PPS12 paragraphs 4.16 – 4.18 refer).

2. Are you aware of other sources of information that the Council should be referring to?

Background evidence on housing delivery, particularly the need for flexibility on planning contributions (including affordable housing) in tougher economic times is noteworthy. The Council should consider site specific infrastructure and viability considerations, not least in the form of appraisals submitted for major strategic site allocations in terms of the capacity to deliver infrastructure and housing. It is important that the LDF provides developers with certainty, and the Core Strategy should make the key decisions on infrastructure.

Should further land be allocated for development West of Crawley it is important that such is made against the context of the Adopted JAAP requirements / any planning approval on the land West of Bewbush and an integrated infrastructure and delivery approach will be needed. The 'At Crawley' and 'LDA' research papers that contributed to the JAAP may require a refresh.

3. Has the Council correctly identified the key issues facing the Borough?

The omission of a specific paper on infrastructure may be an oversight given the vital role of the Core Strategy in achieving infrastructure delivery, although paper 12 does refer in part. It would be advisable for a draft Borough wide infrastructure delivery paper to be formulated prior to Proposed Submission to inform this. Paper 8 identifies a range of options for transport investment, though it is not clear how decisions will be made on the forms which would be most appropriate for the town. There is a need for a body which will champion and evaluate the benefits of investment in non-car infrastructure to help with the Planning Authority's decision making, possibly a role for Sustrans?

Topic Paper 1 – Objectives & Vision

1. Crawley should function as key part of the wider South East region, working with neighbouring Local Authorities in terms of delivering housing, employment and infrastructure etc to allow regional success. The three options for the overall objectives & vision are noted, though Crest Nicholson fears that all three will not succeed in isolation. A fourth option would be to employ all three options.

A key omission is the need to positively embrace change, growth and development through proactive planning and integrated spatial policy. Restrictive land use principles will not achieve this. By recognising that Crawley functions as a key part of the wider South East region, including in process terms; joint working, the delivery of development and the South East Plan objectives will be greatly assisted. In economic/housing market and transport terms, the wider areas are clearly interrelated. Close co-operation with West Sussex County Council on Highways and wider infrastructure issues is vital. With regards to the above, wording is provided for a revised option.

2. Crawley should work with neighbouring Local Authorities but the growth, development and improvement of the Crawley / Gatwick sub regional area would be paramount

Agree, but not in isolation. See response to 1.

3. Crawley should prioritise protecting and meeting the needs of the town itself rather than concentrating on its sub regional and regional function

Disagree in isolation; such can only be achieved via a sub regional perspective. The approach of 3. may lead to a deterioration in the town's wellbeing.

Officer Response: Note responses. Despite considerable sub regional work being undertaken and proposed to inform the sub region's Core Strategies, there is no intention to bring forward a joint Core Strategy, at this stage.

An Infrastructure Plan will be a critical supporting document for the Core Strategy. An updated "At Crawley Study" is underway.

Note the approach advocated with regards to infrastructure. An Infrastructure Plan will be a critical supporting document for the Core Strategy and the concerns will be addressed in the formulation of the Core Strategy and its evidence base.

Note the scenario advocated, particularly the emphasis on sub regional joint working and employment of a hybrid scenario. However, it is important that a proactive approach to growth is balanced against the need to protect the environment and character of Crawley

Ms Samantha Coates
Respondent Ref: 150243
SEEDA (South East England Development Agency)

Representation Summary: The Council's preferred approach should recognise the role of Crawley as a central part of the Gatwick Diamond as identified in Regional Economic Strategy and work with neighbouring authorities to establish a sub regional economic vision. Scenario 3 of topic paper is too narrow a focus and could limit economic potential of sub region

Officer Response: Approach advocated is noted.

Mr Richard J Evans
Respondent Ref: 150656
Surrey County Council

Representation Summary: General concern over the amount and direction of growth anticipated for the Borough, including housing provision levels, and intentions for retail and economic growth within Crawley Town Centre in order to raise the town's regional profile.

In terms of the options outlined, SCC would on balance, SUPPORT Option 3 whereby the Borough would prioritise protecting and meeting the needs of the town itself rather than concentrating on it's sub regional and regional function. In our view, least impact is liable to accrue on Surrey Districts as a consequence of this approach. Infrastructure requirements can also be brought forward more rationally.

The Borough Council will be aware that the adjacent Surrey Districts/Boroughs have yet to adopt Core Strategies to take housing and infrastructure provision to 2026. It would be premature to promote Crawley Borough's growth in advance of adjoining authorities' long term planning work.

Officer Response: Note the support for scenario 3. The Core Strategy will have full regard to other emerging Core Strategies and the Council will continue to work with all the authorities in the Gatwick sub region (as defined by the South East Plan). The South East Plan already indicates that Crawley should provide a focus for new development, including a growing and changing role for the Town Centre. However, the Council will seek to ensure that the South East Plan requirements for housing and for delivering sustainable economic growth are planned for through joint authority working and other sub regional agencies, such as the Gatwick Diamond.

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: If any of the three options suggested are to be taken forward in a sustainable manner, it is important that development is considered within the environmental capacity of the area. Detailed up to date ecological data should part of the evidence base if biodiversity gains are to be delivered in the spirit of PPS9 and Policy NRM5 iv, v and vii of the SEP.

Information enclosed - Policy card and biodiversity opportunity area map.

Officer Response: Noted. This evidence with be formulated through the production of the Core Strategy.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: WSCC is keen that new development makes best use of existing and planned infrastructure, meets the economic and social needs of local communities, is located outside areas of flood or other risks, provides for travel by sustainable means, and assists in the regeneration of the coastal communities. It will be for Crawley Borough Council (CBC) and its partners to determine which of the scenarios best meets these needs.

Officer Response: Noted

Mr J Woolf
Respondent Ref: 151548
Woolf Bond Planning (on behalf of Taylor Wimpey and Beazer Homes)

Representation Summary: Favour a combination of either Scenarios 1 and 2, as they support the maintenance of major growth in and around Crawley. In particular, it is essential that the Local Authority supports development at the North East Sector as part of its development strategy. The site should be brought forward for development and the requirement should be maintained in the Core Strategy Review, in accordance with the provisions of the South East Plan.

Officer Response: Noted. The Inspector's decision on the NES Inquiry is awaited. Once this is known, the most appropriate strategy for accommodating the requirements of the South East Plan will be established through the Core Strategy's evidence base taking account of site suitability.

Mrs Eves
Respondent Ref: 152306

Representation Summary: Crawley should work with neighbouring local authorities, but should not let them see it as a dumping ground for their additional housing needs etc. Crawley is reaching the limit of its space available for new housing developments, therefore if it is to expand more it should be given land from other authorities to prevent the housing density from being too great.

Officer Response: Noted

Mr B Wharton
Respondent Ref: 152314

Representation Summary: It is good that you want to preserve and continue the New Town's high quality neighbourhoods but where is there land to build all of these things that you are proposing in Crawley without continuing to cram build and spoil what is left of the New Town? We must consider the impact on existing residents.

It is really the Council's job to keep the balance between the environment and the economy. It would take ordinary people all day every day to keep up with all the documentation and planning applications. Up until the recession hit there was just too much going on, even this whole process is tackling so many issues at once over such along time frame. Rapid development is rarely good development.

Officer Response: Noted. The Core Strategy will seek to balance the requirements of the South East Plan with the need to ensure Crawley remains a sustainable, attractive town for future and existing residents, visitors and workers.

Mr Tim Hoskinson
Respondent Ref: 150185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: Support new town and neighbourhood principle and sustainable transport.

Agree with and support option 1 of three possible options.

Concur with option 2 but prefer option 1.

Option 3 falls short of requirements of SEP.

Officer Response: Noted.

Mr Tony Fullwood
Respondent Ref: 146753
On behalf of Mrs Williams

Representation Summary: The Housing Topic Paper makes it clear that there will be a shortfall for new housing sites whether or not the North East Sector is considered developable during the Core Strategy period.

Object to Scenario 1. This scenario presumes that there will be a failure to meet the SE Plan requirement within the Borough but without the necessary evidence base to support this position. For example, the appeal into the planning application for the NE Sector has not been concluded and the potential for other sites to meet the requirement has not been fully or accurately assessed (see comments on Topic Paper 5).

Comment on Scenario 2. This option sets out the correct sequential approach for the Core Strategy at this stage. Policy H1 of the SE Plan states that local planning authorities will prepare plans, strategies and programmes to ensure the delivery of the annual average net additional dwelling requirement. Para 24.7 of the SE Plan states that local planning

authorities will provide for the level of housing development within this sub-region in accordance with the distribution in this policy. Only in exceptional circumstances can they seek to provide for the balance of their sub-regional requirement in the remainder of their area and only then provided the objectives of the sub-regional strategy can be met. Within this context, the Borough Council has, wherever possible, to provide housing within its boundaries

Object to Scenario 3. The housing requirement is fixed for the Borough in the South East Plan. Whilst the Borough Council may chose alternative locations for meeting the housing requirement, the requirement itself should not be reduced in any circumstances.

Officer Response: Noted. It is acknowledged that the North East Sector Inquiry decision will have a significant bearing on how and where the Council seeks to achieve its South East Plan requirement. At this stage, all the options in Topic Paper 5 (housing) remain appropriate. The Preferred Strategy will outline the Council's preferred approach in light of the North East Sector Inquiry decision and outline the consideration given to other options.

Mr Tony Fullwood
Respondent Ref: 146746
On behalf of Mr Robinson

Representation Summary: The Housing Topic Paper makes it clear that there will be a shortfall for new housing sites whether or not the North East Sector is considered developable during the Core Strategy period.

Object to Scenario 1. This scenario presumes that there will be a failure to meet the SE Plan requirement within the Borough but without the necessary evidence base to support this position. For example, the appeal into the planning application for the NE Sector has not been concluded and the potential for other sites to meet the requirement has not been fully or accurately assessed (see comments on Topic Paper 5).

Comment on Scenario 2. This option sets out the correct sequential approach for the Core Strategy at this stage. Policy H1 of the SE Plan states that local planning authorities will prepare plans, strategies and programmes to ensure the delivery of the annual average net additional dwelling requirement. Para 24.7 of the SE Plan states that local planning authorities will provide for the level of housing development within this sub-region in accordance with the distribution in this policy. Only in exceptional circumstances can they seek to provide for the balance of their sub-regional requirement in the remainder of their area and only then provided the objectives of the sub-regional strategy can be met. Within this context, the Borough Council has, wherever possible, to provide housing within its boundaries

Object to Scenario 3. The housing requirement is fixed for the Borough in the South East Plan. Whilst the Borough Council may chose alternative locations for meeting the housing requirement, the requirement itself should not be reduced in any circumstances.

Officer Response: Noted. It is acknowledged that the North East Sector Inquiry decision will have a significant bearing on how and where the Council seeks to achieve its South East Plan requirement. At this stage, all the options in Topic Paper 5 (housing) remain appropriate. The Preferred Strategy will outline the Council's preferred approach in light of the North East Sector Inquiry decision and outline the consideration given to other options.

Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and Welbeck Land Limited

Representation Summary: The Consortium supports the Council's objective to reinforce Crawley's positions at the heart of the Gatwick Sub-Region, as well as ensuring the towns vitality and sustainable growth.

CSR policy should reflect the requirements of Policy GAT3 'Housing Distribution', which states that the majority of future development should be in the form of major developments at or adjoining Crawley. In such circumstances it is important for the CSR to confirm through policy, the objectives for such allocations and the need for cross boundary working arrangements.

Agree with Crawley's Neighbourhood principles should remain at the heart of development within and at Crawley.

Officer Response: The support for Crawley's position at the heart of the sub region is noted. The Preferred Strategy will outline the Council's preferred approach for accommodating the South East Plan's housing requirement. This will have regard to the North East Sector Inquiry decision, the outcome of sub regional studies, the policy direction of neighbouring authorities and consideration of alternative options. The support for the neighbourhood principle is noted.

Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport

Representation Summary: We support the principle identified in topic paper 1 'key issues' that the CSR should contain a robust policy for supporting the growth of the airport in its current form as a one runway two terminal airport. We believe it is also necessary for the CSR to include a clear policy statement on the need to safeguard land at Gatwick Airport for a possible wide spaced second runway post 2019. This would be in line with both regional planning policy contained in the South East Plan Policy T9 and national planning policy on aviation contained in the Air Transport White Paper (ATWP) 2003.

We agree with the proposals in topic paper 1 under 'indication of options' for the continued need to include in any chosen proposed policy scenario

a set of supportive and proactive policies on sustainable transport and in particular the need for further rail station improvements.

In terms of the scenario options proposed in topic paper 1 our preference would be for adoption of scenario 3 in the CSR. We strongly support the principle in scenario 3 to continue to safeguard for a possible second runway at Gatwick. However we would seek a text amendment to scenario 3 which currently states that '*the ATWP is preventing the Council meeting that (land allocation) requirement within its boundary*'. We believe that it is inappropriate for CBC to present such wording as the ATWP represents current national planning policy and in the hierarchy of the current plan led system must therefore be adhered to. In addition, the South East Plan positively supports the need to safeguard land at Gatwick for a possible second runway post 2019 and as current regional planning policy the CBC CSR is required to reflect this policy direction.

It is our view that it would be more beneficial to the CSR if topic paper 1 had presented just two scenarios i.e. the existing scenario 1, and a new scenario which would be a combination of the proposed scenarios 2 and 3. This is mainly due to the high degree of similarity of the existing scenarios 2 and 3 which in our view only adds complexity when comparing the three scenarios.

We support the development of a university centre or an improved higher education provision in Crawley as we believe that such an education facility would positively contribute towards building skill sets and enhancing work experiences and opportunities through links to the airport, Crawley and the wider region.

We do support specific aspects of CBC's initial 'indication of potential direction'. We are in favour of the CRS in terms of:

- adopting a combination of the sub regional focus as well as a local planning emphasis as presented in the scenario's 1, 2 and 3
- striving to ensure that Crawley with its support from Gatwick Airport remains a key economic force in the Gatwick Diamond
- the implementation of a comprehensive transport strategy with a strong focus on sustainable transport.

However we do not agree with a number of points contained in topic paper 1 namely;

That the 7,500 required residential dwellings should and can only be accommodated in the North East Sector (NES). This conflicts with both the ATWP and the Regional Spatial Strategy which both support the need to safeguard land for a possible wide-spaced second runway at Gatwick. We feel the approach taken by CBC needs to be more strategic and explore options for cross boundary working with neighbouring planning authorities in terms of housing provision. CBC has previously undertaken such approaches as demonstrated by the Joint Area Action Plan for the land West of Bewbush. A more flexible cross boundary approach to planning may assist in resolving the key housing land allocation shortfalls that continue to be a priority for the CSR, and would also serve to demonstrate CBC adopting a more spatial approach to land use planning as is considered to be current best practice.

We would like CBC to take into account the potential significant positive socio economic contribution to the town and surrounding region that future airport expansion will bring rather than at this stage not accepting future growth beyond 45mppa within its CSR.

Officer Response: The Council notes the support for the continued safeguarding of land for a possible second runway at Gatwick. Support is also noted for the growth of the airport in a one runway two terminal format. Support for option three noted and the proposed revised wording regarding the AWP. Support for higher education provision noted. Opposition to option 1 is noted. The comment regarding the Council's position on airport expansion beyond 45 mppa is noted.

TOPIC PAPER 2 – CLIMATE CHANGE AND SUSTAINABILITY

Mrs Pippa Aitken

Respondent Ref: 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

The HCA supports the Council's acknowledgement that climate change and sustainability are key issues that cut across the whole of the Core Strategy Review. However, it is also noted that the Inspector in the previous Core Strategy Examination has effectively put down a marker for this Review that any policies on this subject must be locally specific and demonstrate why they are needed. This reflects his acknowledgement that there is already national policy, reflected in the PPS1 Supplement, Planning and Climate Change, on this subject which provides an overarching framework for addressing this issue.

In this context, the HCA considers that the Council's emerging evidence base will need to provide a sufficient level of justification for the approach it wishes to take.

Officer Response: Noted and agreed. The Council is preparing an evidence base to assess if it's appropriate to set locally specific targets and if so what they should be. This work will inform the Preferred Strategy document.

Miss Katie Gosling

Respondent Ref: 148072

Environment Agency

Representation Summary: Bullet point 3 'crosscutting issues' should consider flood risk, which is likely to increase with climate change.

Reference is made to the need for water efficiency to accommodate growth, but no targets for water efficiency are set. The South East is an area of serious water stress, and the lack of targets published in the

South East Plan make it even more important that water efficiency targets are included in the LDF. We would like to see all dwellings built to a whole home water standard of 105 litres per person per day, Code for Sustainable Homes level 3/4, as a minimum. Attention should also be paid to waste-water infrastructure to ensure that adequate sewage treatment works and other waste-water infrastructure is provided in a timely manner.

Officer Response: Noted – Water efficiency and possible local targets are currently being assessed and any targets or requirements justified may be included in the Preferred Strategy

Mr Peter Minshull

Respondent Ref: 148635

Highways Agency

Representation Summary: HA consider that transport sustainability should be a key part of the sustainability considerations noted in Option 1.

For Option 2, clear guidance should be available to developers stating what will be expected in transport terms for sustainability purposes.

Officer Response: Noted and agreed

Mrs Jenny Frost

Respondent Ref: 148833

Ifield Village Conservation Area Advisory Committee

Representation Summary: IVCAAC agrees with the aims, and do not think that the West of Bewbush (JAAP) Inspector's Report should stop making sustainability targets advisory (rather than conditional) a Council objective. We accept that we may have to get used to very different building designs. Could there be design awards for sustainable buildings?

Officer Response: The Borough Council is currently assessing whether it is possible to set locally specific targets beyond national requirements. This evidence base will inform the next stage (Preferred Strategy). The concept of awards will be considered in partnership with the Council's Environment Unit.

**Mr Christopher Francis
Respondent Ref: 148841
West and Partners**

Representation Summary: Support the inclusion of reasonable targets for the reduction of CO2 emissions and the production of energy from 'green sources', however, any targets to be set need to be realistic in terms of practical delivery and the need for viability to be assessed in seeking such provisions so as not to undermine the delivery of development.

Officer Response: The evidence base into locally specific targets will include an assessment as to whether they are appropriate, deliverable and viable.

**Mrs Marian Ashdown
Respondent Ref: 149542
Natural England**

Representation Summary: Natural England supports the indication of the potential direction.

Officer Response: Noted

**Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association**

Representation Summary: The whole question I regard as a 'red herring', and I do not feel adequately informed to proffer an opinion on 'feasibility'. More explanation needed.

Officer Response: More information and targets will be developed in line with the Preferred Strategy document

**Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council**

Representation Summary: Support the approach of setting local targets and raising the bar above national requirements. As the policy is cross cutting, suggest that air quality is referred to in policy.

Suggests targets are phased across the plan period, which will sit well with the current economic climate.

Officer Response: The current work which looks to assess options for locally specific targets will also look at the timeframe for setting phased targets.

Air quality will be considered as part of the Preferred Strategy document.

**Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)**

Representation Summary: 1. Should sustainability be a priority in assessing new developments across the town and, if so, what targets or time periods should be used to phase in the requirements?

Yes, but against the context of the established National and Regional planning policies. The planning system need not repeat requirements made under the building regulations. The South East Plan already

outlines a step change in improvements to sustainable construction including on site renewables/ low carbon energy requirements. Consistency in the sustainability standards will provide certainty for private sector investors in Crawley, particularly if the wider National and Regional agenda is reflected. Should Crawley demonstrate local reasons for adopting different sustainability standards then this should be fully justified with evidence as per the PPS1 supplement.

2. How can we assist developers to understand our requirements and ensure that they are met, whilst being viable, deliverable and achievable?

Any policy on climate change/ sustainability should be justified and accompanied by succinct draft SPD (at the Proposed Submission stage). This could form a 'sustainability checklist' compiled using best practice balanced alongside a clear mechanism to allow viability testing.

3. What measures can/should the Council take to tackle climate change in Crawley?

This should be explored by background justification/ feasibility studies. This may demonstrate no exceptional characteristics, and as such the Borough should simply adopt the National / Regional approach (which is still a step change from previous construction standards). The Council should note that the CLG is presently consulting on changes to Part L of the Building Regulations that will effectively introduce Code Level 3 (25% reduction in Co2) from October 2010 nationwide.

Officer Response: Agree with responses. The Council is preparing an evidence base to assess if it's appropriate to set locally specific targets and if so what they should be. This work will provide a justification to policies and Supplementary Planning guidance to support any new policies.

Ms Samantha Coates
Respondent Ref: 150243
SEEDA (South East England Development Agency)

Representation Summary: SEEDA welcomes the indication of potential direction particularly setting CO2 emission targets above national target, requiring that targets be met within development boundaries and an early indication of how such targets will be delivered. There should also be some degree of flexibility built in so development is not tendered.

Officer Response: Noted

Mr David Sims
Respondent Ref: 150417
Southern Water Services

Representation Summary: Southern Water is committed to meeting additional water supply demands arising from the LDF. Water efficiency is particularly important at a time when demand for water is rising and per capita water consumption is increasing.

Water conservation measures are encouraged, and efficient use of infrastructure would be consistent with sustainability principles. At large developments or mixed-ownership sites, a whole site approach to water service provision would promote efficiency. Protection of the quality and yield of water resources is also important (a responsibility of the Environment Agency).

Officer Response: The Council notes the pressure that current development requirements are placing upon water infrastructure and resources within the sub-region. In order to ensure that future development, and in particular strategic development, is planned with water infrastructure in mind, the Council will be working alongside neighbouring authorities, water infrastructure providers, and the Environment Agency, to undertake a Water Cycle Study. This will form part of the evidence base informing the location and phasing of strategic development at Crawley, so as to ensure that appropriate water infrastructure is available to service the development(s). As per the requirements of the European Water Framework Directive, and emerging Environment Agency Thames River Basin Management Plan, it is anticipated that the Water Cycle

Study will also consider the impact of development upon water quality, and suggest mitigation options in order to ensure that development does not negatively impact upon water quality.

**Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust**

Representation Summary: Adaptation to climate change is as important as mitigation. Biodiversity is an indicator of a healthy environment and species need to be able to move across the landscape in response to changes in climatic conditions. It is important to plan future land use and management carefully to ensure not only species movement but also provision of environmental services which need to be protected within an ecological network. *(More details in enclosed documents).*

Officer Response: Noted: The Preferred Strategy document will consider both mitigation and adaptation. Also, cross divisional work will consider bio-diversity and adapting to climate change as part of its core functions.

**Ms Gemma Grimes
Respondent Ref: 150896
The British Wind Energy Association (BWEA)**

Representation Summary: The planning system needs to support the delivery of the timetable for reducing carbon emissions from domestic and non-domestic buildings, and local authorities are expected to actively encourage smaller scale renewable energy schemes through positively expressed policies.

It is strongly recommended that the Council introduce specific policies designed to deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change.

It is strongly recommended that an overarching climate change policy is included within the Core Strategy, alongside pro-active sustainability policies within the Development Control DPD. The use of generic phrases which simply seek to encourage sustainable development should be avoided; such phrases lack the detail and commitment necessary to ensure such aspirations are achieved.

Policies should promote and encourage, rather than restrict, the development of renewable energy resources, and the Council is strongly urged to implement a policy for the mandatory requirement for onsite renewables. *(Suggested wording is provided to this effect)*

The LDF should include a robust criteria based policy to assess all applications for renewable energy developments, and it is recommended that a specific Development Control renewable energy policy should be included, focussing on the criteria used to judge applications, and providing a direct reference to PPS22.

A discrete policy relating to sustainable design and construction methods is also recommended, alongside the introduction of minimum efficiency standards for works in existing buildings. In accordance with PPS1, local authorities should have an evidence-based understanding of local feasibility and potential for renewable and low-carbon technologies. It is recommended that the development plan should include a brief outline of different renewable energy technologies. The potential for an Energy Services Company and site-wide CHP should also be considered for inclusion.

Officer Response: The Inspector in the previous Core Strategy Examination made it clear that any sustainability policies must be locally specific and not repeat national guidance / targets. The Council is preparing an evidence base to assess if it's appropriate to set locally specific targets and if so what they should be. This work will inform the Preferred Strategy document.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: It is suggested that the policy should cut Co2 emissions by a set amount. Renewable source targets are fine but do not deal with the issue that we actually all use too much energy. Thus agree with the CBC approach.

It is not always technically viable on site although some effort should be made/demonstrated before developments are allowed to pay into an offset fund/use off-site. Thus half agree with the CBC approach

Agree that Crawley should set higher targets than national guidance. An area based policy may not work as the areas just became too small to accurately measure - it's difficult enough to measure as it is! Suggest that the whole town is treated the same. Thus disagree with the CBC approach.

A phased approach is quite reasonable. Thus agree with the CBC approach.
All developments should comply. Thus agree with the Crawley Borough Council approach.

Officer Response: Support for potential approaches is noted.

The “on site is off site” issue is being considered as part of the evidence base to test technical viability. This will be explored in the preferred strategy.

A blanket target across the whole town may not raise the bar when location specific critical mass and technological opportunities could allow a greater CO2 reduction to be achieved. However, this is also being investigated alongside phasing and renewable energy targets.

Mrs Eves

Respondent Ref: 152306

Representation Summary: Encourage 'green' building standards, including living green roofs, sustainable materials, grey water systems and wind turbines.

Encourage greater use of soft landscaping to improve air quality and visual appearance of new builds. Encourage greater retention of existing trees.

Officer Response: Green buildings” and the landscape of the site is currently being considered as part of an emerging sustainable design policy and will build on the Council’s SPG on ‘greening the environment’.

Mr B Wharton
Respondent Ref: 152314

Representation Summary: How can it be sustainable to not just continue growth in Crawley, which has been almost non stop since the New Town was started, but to actually increase the rate of rapid and massive growth?

Officer Response: The South East Plan sets development requirements for Crawley to 2026 which the Core Strategy Review plans to meet. The policy and evidence base surrounding sustainability issues aims to ensure that any new development has a reduced impact on the local environment and that growth is located in the most sustainable areas and developed in the most energy efficient way.

Mr Tim Hoskinson
Respondent Ref: 150185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: The Core Strategy should avoid setting detailed targets and time scales as quickly become out of date. It should express LPA commitment to supporting delivery of development that complies with carbon reduction etc and identify future areas of planning concern eg design guidance including new construction methods that might feed into future SPD's as implications of initiatives such as Code for Sustainable Homes becomes clearer.

The Council should retain a balanced view of what sustainable development entails, including social progress and economic development rather than just narrow environmental and natural resource considerations that this topic paper focuses on.

The Council should specify in general terms a list of sustainable construction methods, renewable energy technologies etc it regards as most appropriate for Borough and produce an SPD which facilitates the integration into new and existing development

Officer Response: The Council is preparing an evidence base to assess if it's appropriate to set locally specific targets and if so what they should be. This work will inform the Preferred Strategy document, and the preparation of Supplementary Planning guidance which can be updated as required.

Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and Welbeck Land Limited

Representation Summary: Agree that sustainability should be a cross cutting policy and should be given consideration in the CSR.

Supports objective of ensuring deliverable policies which do not make the scheme unviable, particularly as any requirements will be delivered together with other planning obligations including affordable housing.

Endorses conclusions of the EIP Inspector in respect of the West of Bewbush JAAP. The inspector notes the importance of para 33 of the supplement to PPS1, 'Planning and Climate Change'. To this end - Any policy requiring a percentage of energy coming from decentralised and renewable or low carbon sources should have regard to viability considerations.

Officer Response: The developing evidence base will ensure that issues of viability are considered when determining any percentage targets.

Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport

Representation Summary: Sustainability and limiting the factors which contribute toward accelerating global warming must be a central consideration of the CSR and a cross cutting theme throughout all of the CSR Policies.

As natural resources become finite it is important to ensure sustainability plays a key role in development and sustainable growth.

We are currently considering a version of the BRE Environmental Assessment Method (BREEAM) as a standard by which to assess development projects. This may be an approach that CBC may also consider as it could be readily adopted in the CSR for all new build projects within the catchments.

If a recognised standard is made the requirement by the CSR and appropriate guidance provided to developers then CBC's concerns regarding the deliverability of sustainability objectives and targets will be easier to qualify and benchmark.

It is our view that the CSR should contain a definitive climate change strategy with deliverable targets and action plans which address both short and long term time frames. We would welcome an input into the development of a climate change strategy for Crawley. This way we could explore opportunities, share ideas, and knowledge and ensure consistency through a more joined up approach.

Encouraged by objective of achieving carbon neutral status in Crawley by 2050. However, carbon neutrality continues to be a widely debated matter in terms of its realistic achievability hence our current approach in developing a low carbon strategy for the airport.

We acknowledge that climate change is an important issue and we are committed to reducing carbon emissions at the airport. We also have a part to play in addressing emissions from aviation in general, and this is considered in wider national and international frameworks.

Officer Response: The Borough Council adopted its Corporate Climate Change Strategy in December 2008. The document contains targets for the town as a whole and for the Councils own operations. It identifies how the issues of low carbon energy provision and improving energy efficiency will be assessed and considered over the next few years. The strategy is also to be reviewed over the next 12 months and will then align with the policies of the Core Strategy Review.

The use of recognised standards with local targets is one of many options being considered as part of the evidence base process. The assessment will look at whether Crawley can and should develop defined local targets or whether it should follow national guidance as it develops. Close partnership working with Gatwick on their sustainable agenda is welcomed.

TOPIC PAPER 3 – DESIGN AND HERITAGE

Mrs Pippa Aitken

Respondent Ref: 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: At the Stakeholder consultation event on 19th May, there was some discussion about the importance of providing high quality, “aspirational” housing which would complement the objective of diversifying and enhancing the Borough’s economic base, and provide an attraction for those employed in high value economic activities to live in the town. It was considered that there was insufficient diversity in the existing housing stock to provide such an attraction.

This issue is not considered in this Topic paper, but the HCA suggests that it is one worthy of consideration, in conjunction with issues related to housing generally. It may be that there are opportunities for creating high quality, higher density environments which complement the generally lower density character typical of New Towns such as Crawley, without adversely impacting on that character.

Officer Response: The Core Strategy review supported by the Strategic Housing Market Assessment will provide for a mix of dwellings in light of the sites allocated and coming forward. Strategic development locations are likely to present the best opportunity to provide larger dwellings.

The appeal of surrounding areas to aspirational households is likely to about more than just the type and mix of housing. Housing market interventions aimed at enabling Crawley to appeal more strongly to aspirational households should be linked to a wide range of public sector investments including skills and training, health, education, community safety and neighbourhood management and town centre improvements. This will be addressed in the Preferred Strategy.

Housing densities within New Town period neighbourhoods have generally been developed at a net density of 30 dph which accords with the national indicative minimum (PPS3, para. 47) rather than being low density. PPS3 states that the density of existing development should not dictate than of new housing (para 50). The Council will maintain its commitment to high quality architecture, landscape and urban design and to improving the environment of the Borough.

Miss Katie Gosling

Respondent Ref: 148072

Environment Agency

Representation Summary: Should include measures such as provision for green roofs, SUDs etc.

Officer Response: The Preferred Strategy document will consider both mitigation and adaptation measures to climate change.

Mrs Jenny Frost

Respondent Ref: 148833

Ifield Village Conservation Area Advisory Committee

Representation Summary: IVCAAC has sent a detailed response to the Heritage Strategy and hopes this will be taken into account when considering this topic. Crawley’s older and historic areas are smaller than in most other towns, and therefore are more precious; they should be protected. New Town architecture needs to be assessed and where appropriate protected, whilst mature trees characterise much of the town.

An assessment should be made of trees that should carry TPOs, with strict policies to protect them from felling.

It may, however, be too subjective to attempt to identify ‘environments that do not work’.

Criteria for 'Building for Life' seem suitable, though sustainability criteria should be added.

Officer Response: Assessments to identify potential new designations, such as Conservation Areas, are being undertaken by the Council.

TPOs are generally used as a reactive tool to a potential development threat, such as a planning application, but offer strict control over works.

Objective criteria, for example including well-established urban design principles and relevant crime data, together with consultation could be used to identify potential areas. This will be addressed in the Preferred Strategy.

Note support for Building for Life. To be addressed at the Preferred Strategy Stage

**Mr Christopher Francis
Respondent Ref: 148841
West and Partners**

Representation Summary: Consider that more could be done to physically regenerate the weak and negative features of the town centre to ensure that existing and new developments seek to enhance the overall attractiveness of the town in order to attract new employment opportunities and major users.

Officer Response: The Town Centre Wide SPD identifies a number of opportunity sites with mixed-use development potential, and the Council is working alongside the Regeneration Board and other partners to deliver these opportunities. The potential allocation of these sites will be addressed in the Preferred Strategy. Developer contributions are also sought from major new Town Centre

developments towards environmental improvements, public art, and additional CCTV cameras.

**Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association**

Representation Summary: Crawley has only woken up to the loss of heritage properties, architecture and green space during the last 3-4 years. Much has already been lost during the past 40 years, and little remains of sufficient quality to make it worth saving. If Crawley is to seriously consider acquiring peripheral land for new neighbourhoods, then heritage properties involved should be saved/restored and put to good use wherever possible.

Officer Response: Note support

**Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council**

Representation Summary: Local distinctiveness should be promoted and those features that give the town its character should be protected and improved. However, relatively modern fabric of Crawley affords opportunity for exciting and innovative design free from burdensome constraints imposed by any historic fabric and therefore areas with environments that do not work well should be proactively changed and managed.

Officer Response: Note support

**Ms Lucy Biddle
Respondent Ref: 150144**

RPS (on behalf of Sussex Police)

Representation Summary: The Core Strategy Review should include objectives and policies that seek to ensure the design of new development works to reduce crime, fear of crime and anti-social behaviour and requires 'Secured By Design' status, where relevant, in terms of both design and layout.

The Crime and Disorder Act 1998 outlines that Local Authorities have a duty to reduce crime through its functions and responsibilities, and this should be reflected through the Core Strategy review. The existing Policy CS1 should be strengthened to this effect, in particular through stipulating that Design and Access statements detail how crime-related issues will be addressed, and also through positively requiring all new developments to achieve Secured By Design standards where applicable. Suggested wording for a revised policy is provided to this effect.

Officer Response: Note support. Design and crime issues to be addressed at the Preferred Strategy Stage

Mr Charles Collins

Respondent Ref: 150201

Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. What physical features make a positive contribution to the character of the town? Should these be protected and, where possible, improved?

Design is covered extensively through the Planning Regulations, National Policy and the South East Plan, and the Core Strategy need not repeat this guidance. Furthermore at the Development Control stage, through the use of high quality Design & Access Statements, developments are required to robustly demonstrate and justify the design approach and solutions adopted. The LDF need only include site or area specific guidance, for example through a Character Appraisal / SPD. A blanket

policy is not needed and would probably be either repetitive of guidance or ineffective given its likely generic nature.

2. Should areas with environments that do not work well be physically changed in some way, or left alone?

Through a Characterisation Appraisal (possibly integrated with the Strategic Land Availability Assessments) the possibility of development / redevelopment in certain regeneration areas could be identified. Opportunities may exist, for example in Bewbush, to increase the quality of development and decrease the amount of redundant open spaces. The value of good urban design and architecture should be noted. Crawley as a new town is characterised by a post modern vernacular and neighbourhoods. Through a long term strategy of change the perception and value of Crawley can be enhanced whilst building on the neighbourhood principles.

3. Could the use of 'Building for Life' housing design quality assessments, by applicants and the Borough Council, help to improve the design of housing schemes?

Potentially yes. Advice and guidance should be included in SPD. Care should be taken should design principles be outlined in a policy for requiring (rather than encouraging) Building for Life criteria, as this may cause contradictions in the application of the policy. In addition, national guidance is very clear that the market should inform the housing mix and space standards of new residential development.

Officer Response: A character appraisal of the Borough has been undertaken and the recommendations concerning positive and less positive areas are currently under consideration to provide locally specific policies in the Preferred Strategy Stage.

The ability of the market to inform the housing mix and space standards has been called into the question recently, given development has recently been dominated by flats offering limited living space. The Borough Council currently uses supplementary

guidance with respect to internal and external space standards for new dwellings.

To be addressed at the Preferred Strategy Stage.

Miss Vicky Aston
Respondent Ref: 150433
Sport England

Representation Summary: Sport England is interested in the potential of urban design and masterplanning to assist in the creation of active and healthy communities, and the intention to encourage good design is welcomed. Sport England and partners have produced 'Active Design', a guide to designing developments which pro-actively encourage physical activity.

Officer Response: To be addressed at the Preferred Strategy Stage

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Recommend including a reference to the Crawley Corporate Heritage Strategy (2008).

As presented, this Topic Paper suggests that WSCC had some involvement in the Crawley Baseline Character Assessment. Although WSCC support the characterisation approach to land-use planning and management, the County Council are not aware of any WSCC involvement in the document. This is unfortunate as additional heritage information and advice might have been available for inclusion.

Surviving visible reminders of the planned medieval 'new town', such as the width of the High Street and remnant medieval property boundaries, should be protected, and, where possible, improved, as part of any urban improvement or development schemes. A baseline survey of surviving ancient historic plot boundaries within the historic core of the town is

needed to inform new improvement schemes. In addition, an integral part of the improvement of features that make a positive contribution to the character of the town should be the communication of their local significance and distinctiveness to the relevant local communities of Crawley.

In the wider context, work towards developing an approach to sharing and communicating the Borough's Heritage should be strongly interlinked with the Council's approach to Design and Heritage.

The sense of place of Neighbourhoods within Crawley could be improved by the selective and sensitive enhancement of environments that do not work well. A heritage component should be included in such schemes.

The proposed emphasis on Buildings for Life is welcomed and its implementation in respect to new development should be informed by the aims of the Crawley Corporate Heritage Strategy.

Officer Response: A character appraisal of the Borough has been undertaken, following discussion with the County Council. The County Council has undertaken an Extensive Urban Survey of the parts of the town. The findings and recommendations of these reports are currently under consideration to be addressed in the Preferred Strategy

Note comments in relation to Buildings for Life.

Mrs J Raish
Respondent Ref: 152264

Representation Summary: Much more should be done to upgrade the older estates and neighbourhoods. Many of the new housing developments look ugly in design and are made up of the cheapest materials – better design is needed.

Officer Response: The Borough Council invests significant funding to improve the residential and neighbourhood centres within the

older neighbourhoods. Architecture and the choice of materials are important considerations in respect of new development, but the quality of other factors such as layout, landscape and space standards also influence whether or not a scheme is successful. The Council is seeking to reinforce existing policies which seek to secure high quality design. To be addressed in the Preferred Strategy.

Mrs Eves
Respondent Ref: 152306

Representation Summary: Crawley has a wealth of pre 1950's buildings and more protection should be afforded them. The areas of Three Bridges and Southgate could be made into conservation areas.

Good design of new builds should be encouraged, see comments re buildings in topic 2.

Officer Response: A character appraisal of the Borough has been undertaken and the recommendations concerning positive and less positive areas are currently under consideration. The Council is seeking to reinforce existing policies which seek to secure high quality design. To be addressed in the Preferred Strategy

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Crawley was originally well designed but it has been eroded by infilling. What is left should be protected because old buildings are not being built anymore.

Officer Response: A character appraisal of the Borough has been undertaken and the recommendations concerning positive and less positive areas are currently under consideration. The infilling of existing areas, where appropriate, is encouraged by Government

policy as a means of limiting the need for development in the countryside and to provide sustainable development that makes best use of existing facilities. The Council is seeking to reinforce existing policies which seek to secure high quality design. To be addressed in the Preferred Strategy

Mr Tim Hoskinson
Respondent Ref: 150185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: Support the concept that historic buildings and their settings and conservation areas should be protected.

Areas which do not work as effectively as they might should be considered for improvement.

'Building for Life' housing design should be used to improve the design of housing schemes and commercial buildings as well.

Officer Response: Note support

Mr Derek Meakings
Respondent Ref: 151803

Representation Summary: The historic area and buildings within Crawley must be given high priority for retention and renovation.

Should the proposed East of Crawley new neighbourhood development at Crabbett Park be further considered then all plans must include the retention of the world wide acclaimed stables and mansion with its vast social history.

All developments must be built to retain the green Crawley aim with substantial landscaping especially on the roadside frontages.

Officer Response: Note support.

The Crabbett Park development is located within the administrative Boundary of Mid Sussex District Council. Currently, the Borough Council objects to this development location. Notwithstanding its objection to the principle of the development, if the proposal were to be allocated in the Mid Sussex Core Strategy the Council would look to work with Mid Sussex to secure a high quality development, which has regard to its proximity to Crawley.

Mr Tony Fullwood
Respondent Ref: 146753
On behalf of Mrs Williams

Representation Summary: Confirm support for the Borough Council's summary of the current context and the identification of Character Areas provided these do not overlap with Conservation Areas for which separate legislation and guidance is available.

Support the Borough Council setting out how potential conflicts between heritage or character assets and new development, would be managed. This is a key aspect of the Borough Council's strategy which requires resolution as insufficient emphasis is placed on the opportunities for enhancing the environment, particularly by enabling or encouraging the redevelopment of buildings which do not meet high design standards or detract from the historic environment allowing enabling development which could bring forward enhancement measures.

Importantly, there is an inherent conflict between policy approaches which requires resolution. Currently there is agreement between

- Planning Policy Guidance PPG15 for example, Para 4.20 (which makes it clear that there is no requirement to protect a conservation area from all development)

- Saved Local Plan Policies BN2 and BN3 which accepts development or redevelopment in principle, provided certain criteria are met, and
- The Worth Conservation Area Statement (2003) which states that Conservation Area designation does not prohibit all future development.

However this policy approach conflicts, in some locations such as the Worth Conservation Area, with Core Strategy Policy C1, which limits development beyond the Built-Up Area Boundary to countryside uses.

The current approach appears to prevent the development or redevelopment opportunities which could result in high quality development which protects or enhances the character of the area. It is for this reason that the Borough Council must revisit the BUAB at Worth and resolve any potential conflicts between heritage/ character assets and new development.

Officer Response: Disagree – All proposed development within a conservation area is required to preserve or enhance the character or appearance of the area's special architectural or historic interest. Change within a conservation area is, therefore, possible if it would meet this requirement. The special architectural or historic interest of the conservation area and its character and appearance may relate in part to open space or views, adding a further constraint to potential development. There is also no requirement for all land within a conservation area to be within a built up area boundary or to be capable of being developed in principle. Consequently, there is no conflict in policy terms.

Mr Tony Fullwood
Respondent Ref: 146746
On behalf of Mr Robinson

Representation Summary: Confirm support for the Borough Council's summary of the current context and the identification of Character Areas

provided these do not overlap with Conservation Areas for which separate legislation and guidance is available.

Support the Borough Council setting out how potential conflicts between heritage or character assets and new development, would be managed. This is a key aspect of the Borough Council's strategy which requires resolution as insufficient emphasis is placed on the opportunities for enhancing the environment, particularly by enabling or encouraging the redevelopment of buildings which do not meet high design standards or detract from the historic environment allowing enabling development which could bring forward enhancement measures.

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However this policy approach conflicts, in some locations such as the Worth Conservation Area, with Core Strategy Policy C1, which limits development beyond the Built-Up Area Boundary to countryside uses.

The current approach appears to prevent the development or redevelopment opportunities which could result in high quality development which protects or enhances the character of the area. It is for this reason that the Borough Council must revisit the BUAB at Worth and resolve any potential conflicts between heritage/ character assets and new development.

Officer Response: Disagree – All proposed development within a conservation area is required to preserve or enhance the character or appearance of the area's special architectural or historic interest. Change within a conservation area is, therefore, possible if it would meet this requirement. The special architectural or historic interest

of the conservation area and its character and appearance may relate in part to open space or views, adding a further constraint to potential development. There is also no requirement for all land within a conservation area to be within a built up area boundary or to be capable of being developed in principle. Consequently, there is no conflict in policy terms.

TOPIC PAPER 4 – AIR, NOISE AND FLOODING

Mrs Pippa Aitken

Respondent Ref: 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: In the HCA’s view, it is not necessary for the Core Strategy Review to include policies which effectively replicate the approach in PPS23, PPG24 and PPS25. However, it is important that local considerations are taken into account when applying national planning policy to local spatial planning. This is particularly relevant in relation to flood risk, where PPS25 makes provision for “exceptions” in identifying locations for development, through application of the Sequential Test and the Exception Test (*further details provided*).

Officer Response: Noted. The Council acknowledge that Core Strategy policies should not replicate national policy, and recognise the importance of local specificity within these policies. To ensure that the necessary level of local specificity is achieved, the preferred approach at this time would be to incorporate a flood risk policy referring developers to the national level guidance of PPS25, and requiring development proposals to comply with the local level recommendations of a regularly updated Strategic Flood Risk Assessment.

Miss Katie Gosling

Respondent Ref: 148072

Environment Agency

Representation Summary: Flood risk is not an issue that can be combined with air quality and noise. We support the use of the SFRA as evidence base, though this must contain up to date information, and currently needs updating. The SFRA provides an overview of the nature and scale of potential flood risk posed to a particular site under consideration, and its findings should be reflected in a locally specific flood risk policy.

Gatwick is an example of an area where such a policy could be developed, and we are keen to work alongside CBC and BAA to agree an integrated approach to managing flood risk at the airport.

The Core Strategy Review should also reflect the findings of the Mole Catchment Flood Management Plan and policy units, particularly regarding areas of the Mole susceptible to rapid flooding from thunderstorms. We do not agree that flood risk in Crawley is as minimal as stated, and there are properties in Crawley that are frequently flooded.

The SFRA and Core Strategy should look to reduce flood risk from all sources, not just fluvial, including surface water flooding, its downstream impact (especially at Gatwick Airport) and appropriate reduction measures. It is important to recognise that development and flood risk policies in Crawley will have a knock-on effect downstream of the borough, and flood risk prevention measures should not be considered in isolation. Full funding for the Upper Mole Flood Alleviation Scheme is yet to be secured.

Officer Response: Noted. It is agreed that issues of air quality, noise and flood risk should not be incorporated into a single policy, and it is the Council’s current intention to incorporate a separate policy relating to flooding. To ensure that the necessary level of local specificity is achieved, the preferred policy approach would refer developers to the national level guidance of PPS25, and would require development proposals to comply with the local level recommendations of an updated Strategic Flood Risk Assessment. The revised Strategic Flood Risk Assessment will be informed by all relevant information, including the River Mole Catchment Flood Management Plan, and will afford appropriate consideration to all potential flood sources in Crawley, including surface flooding. In order to ensure that the revised SFRA is robust and credible, it is anticipated that the Environment Agency will be afforded full buy-in into the SFRA process, including final sign-off of the study.

The Council is also in the early stages of working alongside both the Environment Agency and Gatwick Airport Ltd to explore opportunities to produce a site-specific Gatwick Airport flood

assessment, which will provide a detailed Strategic Flood Risk Assessment, and will further inform the Core Strategy evidence base.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: IVCAAC agrees with the aims. The avoidance of inappropriate development in areas of flood risk, advocated in PPS25, is supported. Ifield has suffered four very bad flooding incidents in the last 41 years, and perhaps flood risk, noise and air quality policies should be separate, in order to ensure that all risks are sufficiently researched.

IVCAAC also has concern about noise and pollution as they could easily affect the conservation area if the second runway goes ahead.

Officer Response: Noted. It is agreed that issues of air quality, noise and flood risk should not be incorporated into a single policy, and it is the Council's current intention to incorporate a separate policy relating to flooding.

Mr Christopher Francis
Respondent Ref: 148841
West and Partners

Representation Summary: Consider that there is no need to repeat national and regional guidance on these topics.

Officer Response: Noted

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: Most of Crawley is too new to have a fuel exhaust problem affecting air quality, and most aircraft noise is carried away from Crawley by prevailing winds. Several areas of Crawley are affected by periodic flooding from the tributaries of the River Mole. The scale of the problem is not large, but some local hotspots would benefit from serious investment and 'opening up' historical problem areas concealed by over-build, e.g. Three Bridges Station. Flood risk evaluation must be dealt with in advance of new urban developments, and a clearer point responsibility should be demonstrated between CBC, WSCC and the Environment Agency than at present. New housing development should not be crammed into areas where flood risk cannot be resolved by engineering practice.

Officer Response: Noted. As part of the Core Strategy Review the Council will be undertaking a review of its existing Strategic Flood Risk Assessment. One of the key objectives of the updated study will be to investigate flood risk within potential strategic development sites, and where flood risk is identified, whether and how this can be mitigated.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: In favour of a locally specific noise and air quality policy and this policy should consider the effects within and beyond the Borough boundaries.

Officer Response: Noted. It is acknowledged that issues of air quality and noise affect areas beyond Crawley's administrative boundary. At this stage, the Council is working to identify the extent to which a locally specific policy would be feasible, and indeed, appropriate, particularly given the requirement that Core Strategy policies do not repeat existing national guidance.

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. Should the Core Strategy Review include a locally specific policy referring to issues of air quality and noise?

No. The matters are covered by PPS23 (Planning & Pollution Control) and PPG24 (Noise). However, a factual noise and air quality map would prove useful as background evidence to assist with planning applications.

2. Should a locally-specific flood risk policy refer to the findings of the current Strategic Flood Risk Assessment?

Again there is no need for a local policy. PPS25 (Flood Risk) covers these issues. The SFRA Map can be used to assist with planning applications and will help with providing a framework in terms of the sequential location of development (policy NRM4 Sustainable Flood Risk Management of the South East Plan refers).

Officer Response: Note response to question 1. At this stage, the Council is working to identify the extent to which a locally specific policy would be feasible, and indeed, appropriate, particularly given the requirement that Core Strategy policies do not repeat existing national guidance. It is acknowledged that an air quality and noise map would be beneficial as a planning tool, and the scope for this will be investigated as part of the Core Strategy Review process.

Note response to question 2. At this stage, the preferred policy approach would be to implement a flood risk policy guiding developers to the national level guidance, and referring developers to the findings of an updated Strategic Flood Risk Assessment. This process would allow the SFRA to be 'hung' direct from a Core Strategy Policy, lending greater policy weight to its outputs and accompanying flood maps.

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: A more naturalistic approach to delivering flood prevention measures can also benefit wildlife and be economically beneficial. See enclosed leaflet and policy card which show how sustainable flood management can be incorporated into a green network.

Officer Response: The Council is in the process of undertaking a range of studies that will inform the Core Strategy Review. These will include the publication of a Corporate Climate change strategy, Strategic Flood Risk Assessment, and Water Cycle Study. These studies will make recommendations regarding environmentally sustainable mitigation and construction techniques which will inform the Core Strategy Review policy approach.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: The Core Strategy Review will need to explain how the SE Plan policies on air quality and noise will be implemented and so locally specific policies are necessary.

A development can, if necessary, be rejected by Planning Authorities on air quality ground and mitigation requirements where air quality impacts are likely needs to be covered, including reference to a formula on the likely cost of mitigation to guide developer proposals.

Whilst there are no AQMAs in the Borough at present, there are a number of hotspots and there is a strong chance that there will be one or more in the very near future. This should be planned for and covered in the Core Strategy Review. Even where there are no AQMA's the potential risk of exceeding Government objectives for pollutants needs to be assessed. Further suggestions for potential policy approaches provided.

Officer Response: Noted. At this stage, the Council is working to identify the extent to which a locally specific policy would be feasible, and indeed, appropriate, particularly given the requirement that Core Strategy policies do not repeat existing national guidance. The publication of an annually updated air quality and noise map may be a beneficial planning tool that could add to the required level of local specificity to complement national guidance, and the scope for this will be investigated as part of the Core Strategy Review process.

Mr J Woolf

Respondent Ref: 151548

Woolf Bond Planning (on behalf of Taylor Wimpey and Beazer Homes)

Representation Summary: Consider that it is not necessary for the Core Strategy Review to include a locally specific policy to guide development in relation to air quality and noise, as they both can be guided by national planning policy.

Officer Response: Noted. At this stage, the Council is working to identify the extent to which a locally specific policy would be feasible, and indeed, appropriate, particularly given the requirement that Core Strategy policies do not repeat existing national guidance.

Mr Hubbard

Respondent Ref: 151662

Representation Summary: Nitrogen dioxide pollution in Ifield should be monitored - it has exceeded 50 micrograms per cubic metre three times in 2002

Officer Response: Noted.

Mrs Eves

Respondent Ref: 152306

Representation Summary: No building should take place in flood plains. The Council should lead by example by providing permeable surfaced car parks. Where streams are managed for flood prevention the ecological aspects need to be considered, eg. access in and out of streams for river creatures.

Increase number of trees within borough as means of improving air quality.

Officer Response: Noted. The Council is currently undertaking a number of studies that will inform the Core Strategy Review, including an updated Strategic Flood Risk Assessment. One of the key objectives of the updated study will be to investigate flood risk within potential strategic development sites, and where flood risk is identified, whether and how this can be mitigated. It is anticipated that the study will also set out recommendations which will be used to provide guidance for, and assist in the determination of planning applications. The Council is also in the process of commissioning work on a Water Cycle Study, which will focus upon, among other things, the impact of development upon the water environment, and methods through which the water quality of existing waterways can be improved to meet the requirements of the European Union Water Framework Directive.

Mr Tim Hoskinson

Respondent Ref: 150185

Savills (on behalf of the Gatwick Green Consortium)

(For full comments see rep)

Representation Summary: It is entirely appropriate for CBC to consider noise and air quality issues.

Flooding should also be addressed by the Core Strategy

Air quality, noise and flooding are all significant issues in their own right so should warrant separate policies although could be in the same section.

Officer Response: Noted

Mr Tony Fullwood
Respondent Ref: 146753
On behalf of Mrs Williams

Representation Summary: Air Quality - Relatively detailed guidance is given in PPS23 and PPS25 in relation to air quality and flood risk and it should not be necessary to repeat this in the Core Strategy unless there are specific local circumstances of such strategic significance to merit a Core Strategy policy. The Topic Paper states that there are no AQMAs in the Borough. In any event, national policy does not prevent development in such areas unless the development could in itself result in the designation of an AQMA. For these reasons there is no need to include an air quality policy in the Core Strategy review.

Noise Pollution - In relation to noise pollution, Crawley has unique considerations, particularly in respect of the airport. The development of a locally-specific policy could be acceptable provided it was not more restrictive than the national policy. This may allow greater flexibility given local circumstances.

Officer Response: Noted. The Council acknowledge that Core Strategy policies should not replicate national and regional policy, and recognise the importance of local specificity within these policies. In relation to issues of air quality and noise, the Council is working to identify the extent to which a locally specific policy would be feasible, and indeed, appropriate, particularly given the requirement that Core Strategy policies do not repeat existing national and regional guidance.

In relation to flood risk, in order to ensure that the necessary level of local specificity is achieved, the preferred approach at this time would be to incorporate a flood risk policy referring developers to the national level guidance of PPS25, and requiring development proposals to comply with the local level recommendations of a regularly updated Strategic Flood Risk Assessment.

Mr Tony Fullwood
Respondent Ref: 146746
On behalf of Mr Robinson

Representation Summary: Air Quality - Relatively detailed guidance is given in PPS23 and PPS25 in relation to air quality and flood risk and it should not be necessary to repeat this in the Core Strategy unless there are specific local circumstances of such strategic significance to merit a Core Strategy policy.

The Topic Paper states that there are no AQMAs in the Borough. In any event, national policy does not prevent development in such areas unless the development could in itself result in the designation of an AQMA. For these reasons there is no need to include an air quality policy in the Core Strategy review.

Noise Pollution - In relation to noise pollution, Crawley has unique considerations, particularly in respect of the airport. The development of a locally-specific policy could be acceptable provided it was not more restrictive than the national policy. This may allow greater flexibility given local circumstances.

Officer Response: Noted. The Council acknowledge that Core Strategy policies should not replicate national and regional policy, and recognise the importance of local specificity within these policies. In relation to issues of air quality and noise, the Council is working to identify the extent to which a locally specific policy would be feasible, and indeed, appropriate, particularly given the requirement that Core Strategy policies do not repeat existing national and regional guidance.

In relation to flood risk, in order to ensure that the necessary level of local specificity is achieved, the preferred approach at this time would be to incorporate a flood risk policy referring developers to the national level guidance of PPS25, and requiring development proposals to comply with the local level recommendations of a regularly updated Strategic Flood Risk Assessment.

**Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and
Welbeck Land Limited**

Representation Summary: Considers NES decision will provide a steer on and create a specific policy requirement for the acceptability of residential development in proximity to the airport, should it be expanded. This may require a specific policy in respect of development in proximity to the proposed expansion of Gatwick Airport.

Officer Response: Noted. The Council is working to identify the extent to which a locally specific noise policy would be feasible and appropriate. It is agreed that the outcomes of the North East Sector Planning Inquiry will provide an indication of the appropriate policy approach.

**Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport**

Representation Summary: Inclusion of a local specific policy within the CSR will not add value in our opinion as it would be unable to implement standards beyond those already adhered to by Gatwick Airport.

It is our strong opinion that it would at this stage be inappropriate for the CSR to consider any additional form of noise impact assessment in relation to a possible second runway at Gatwick Airport. It would create a number of planning complications, for example blight, which we do not feel it is for the CSR to predict or manage at this time. It is our view that noise abatement techniques and standards for a possible second runway in the future at Gatwick Airport (and other environmental concerns) should be a matter for the ATWP Progress Report and the forthcoming national policy statement (NPS) for airports.

We have recently produced our draft European Noise Directive (END) noise action plan. This is currently out for consultation with stakeholders and will be verified by the DfT later this year.

CSR review should continue to promote policies which seek to appropriately locate new noise sensitive development away from existing noise nuisance sources, and do not permit proposals which emit high levels of noise to be developed in close proximity of noise sensitive receptors.

Support the reference to SFRA in the CSR as a vital aspect of delivering effective flood management and abatement.

(See rep for more background info)

Officer Response: Noted. At this early stage in the Core Strategy Review process, the Council is working to identify the extent to which a locally specific noise policy would be feasible, and indeed, appropriate. The Core Strategy Review will not seek to establish future noise standards for Gatwick as it is agreed that this would be beyond the remit of this particular document. As such, it is anticipated that any Core Strategy Review noise policy will seek to build upon national guidance within a locally specific context, affording appropriate regard to the content of existing and emerging airport policy documents. It is anticipated that the outcomes of the North East Sector Inquiry and the noise action plan for Gatwick will provide an indication of the appropriate policy direction.

Support for the undertaking of the SFRA Review is noted.

TOPIC PAPER 5 – HOUSING

Mr John Brindley
Respondent Ref: 146704
Bellway Homes

Representation Summary: We support the recognition that although reliant on continued joint working and agreement with neighbouring authorities, further strategic development at Crawley, typically in the form of a strategic development location of 2,000 family dwellings, could make a contribution towards the Borough's requirement. We also support the At Crawley Study 2009 investigation into the feasibility and appropriateness of accommodating strategic development west of Ifield.

Officer Response: Support noted

Mr Peter Smith
Respondent Ref: 147686
Cycling Touring Club (CTC)

Representation Summary: All new developments should include properly designed routes, even if they are only for a short stretch.

Officer Response: Noted

Mrs Pippa Aitken
Respondent Ref: 147710
CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary : This topic is of considerable interest to the HCA, given its landowner interests in Crawley. It also owns land to the west of Crawley, in Horsham District.

The HCA notes the Council's preferred approach of "ring fencing" the housing numbers from the North East Sector. In the HCA's view, this approach is appropriate for the moment, but it is apparent that there will be greater clarity from the Inquiry outcome within a relatively short time frame, which must then inform the next stages of the Core Strategy review process.

Setting aside the North East Sector issue, the HCA has considered the options for meeting remaining housing numbers of around 4,800. In principle, it considers that the Council should make every effort to meet its housing requirements within the Borough boundary, and on this basis it supports the concept of developing "partial neighbourhoods", one of which would involve development of the southern section of the North East Sector, on land owned by the HCA.

It would wish to work with the Council on ensuring that any development in this location could be integrated as far as possible with existing development, whilst retaining the opportunity of ultimately integrating with the remaining area of the North East Sector which is affected by possible Gatwick expansion, as and when that issue is resolved.

The HCA notes that, even with the approach outlined above, there will still be a shortfall of 1,400 dwellings, which it is proposed will be met through windfalls. However, it considers that the Council will need to justify such an approach having regard to the advice in paragraph 59 of PPS3.

If such justification cannot be provided, the Council may wish to consider working with adjoining authorities to determine whether the Crawley shortfall can be "made up" through the development of sustainable urban extensions on land within the adjoining authorities.

If it is concluded that the development of "partial neighbourhoods" is not an appropriate response to achieving sustainable development within Crawley's boundary, the HCA supports the principle of joint working between Crawley and adjoining authorities to deliver a sustainable urban extension(s) to the town.

When considering the best ways of delivering new housing, the HCA would wish to ensure that the Council is meeting a wide range of housing

needs, including those of the elderly, vulnerable groups and gypsies. In the HCA's view, appropriate minimum space standards should be developed to meet the needs of specific groups".

Officer Response: Should the North East Sector remain unavailable the Council will need to consider what other options are available to meet the South East Plan requirements and what, if any, contingency arrangements should be put in place. However, the Council would want to ensure that, whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

Mr Peter Minshull
Respondent Ref: 148635
Highways Agency

Representation Summary: In general the HA is content with the approach of locating housing in the North East Sector. However, if the new owner of Gatwick wants to start planning for a second runway in advance of 2019 then the HA would wish to be involved.

The HA is also concerned about the option to ring fence the land at the North East Sector and not commence a back-up option, as it may result in CBC not being able to deliver its housing requirements. There then may be a risk that the Core Strategy Review will not be in conformity with PPS12 with regards to having a housing supply that is deliverable, available and achievable. This could result in CBC having to undertake a late site identification exercise.

If it becomes apparent that it will be necessary to explore land for a strategic development outside of the borough boundary then the HA considers that discussions with the key stakeholders should begin at the earliest opportunity. This will enable the testing of transport options to be undertaken and for the HA to be satisfied that the transport implications of such an approach will not lead to a material impact on the Strategic Road Network within and around Crawley.

Care must be taken to ensure that there is not an over provision or imbalance of either residential or employment development as this may result in an increase in commuting. It will also be essential that an appropriate level of sustainable transport infrastructure comes forward to support the growth. The HA strongly urge that residential developments are required to have travel plans.

Officer Response: Noted, the Council will seek to develop a housing solution that is deliverable, available and achievable. In addition, the Council's infrastructure plan will help scope the impact of additional development at Crawley on infrastructure, including the Strategic Road Network. The Highway Authority will be expected to be involved in this work. A decision on travel plans can be made in the context of the infrastructure plan's findings.

Mrs Barbara Childs
Respondent Ref: 148734
Horsham District Council

Representation Summary: HDC is not in a position to support the option of CBC meeting their own housing requirements outside of the Borough Boundary, particularly when HDC and other councils are having difficulty in meeting their own requirements. As we have not completed our own options work it is difficult to envisage a situation where we would be able to support such an approach.

TP discusses general theme but does specifically mention locations such as West of Ifield. Considers that such issues need to be publicly scrutinised at the earliest practical opportunity.

This position is of course subject to further work being undertaken in partnership between the two councils and HDC fully expects longer term partnership working towards meeting sub-regional housing figures.

HDC are supportive of wording and approaches set out in options 1 and 2 of TP5 in terms of the Borough looking outside its boundary and wishes to

see this consistently applied across the Topics and in future stages of the CSR.

Word of caution over whether current options that float the possibility of sub-regional development outside of Crawley's boundary, as worded and if followed through, would be appropriately 'justified' as the most appropriate strategy and 'Effective' in terms of deliverability and flexibility, due to the issues raised above (and for TP1).

Officer Response: The Council is already collaborating with neighbouring authorities on several key pieces of evidence for the Core Strategies. Further direction regarding joint authority working will be provided at Preferred Strategy stage and the Council will continue to engage fully with neighbouring authorities throughout the formulation of the Core Strategy and its evidence base.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: IVCAAC is very concerned by the 7,500 plus housing allocation, as there is not enough land left within the borough, and wonders whether the figure can be challenged at this late stage.

IVCAAC is also concerned that Horsham will apply pressure on land west of Crawley which is not suitable from a transport point of view. Further development in Ifield would increase traffic through the conservation area. IVCAAC can see the argument for 'ring-fencing' the 2,700 houses that could potentially be built in the North East Sector, which would leave only 300 houses to be found, though have grave concerns regarding the potential loss of the town's limited open space (e.g. Tilgate Golf Course) to housing.

Partial neighbourhood development is also a concern, as this would not provide adequate infrastructure, and is against CBC's objective of New Town neighbourhoods.

Officer Response: The comments are noted, should the North East Sector remain unavailable the Council will need to consider what other options are available to meet the South East Plan requirements and what, if any, contingency arrangements should be put in place. However, the Council would want to ensure that, whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

Mr Christopher Francis
Respondent Ref: 148841
West and Partners

Representation Summary: Note that the Strategic Housing Land Availability Assessment (2009) includes the land at Station Way and consider that the Core Strategy should encourage reasonable maximisation of all development opportunities to meet the identified housing target figure.

We support the inclusion of the need for viability to be assessed in seeking the provision of affordable housing and the mix of tenure within schemes so as not to undermine the delivery of development and that affordable housing delivery will be focussed towards smaller dwellings.

Officer Response: The Council's approach towards affordable housing is to seek an appropriate mix to meet identified needs, including the provision of smaller dwellings.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: Would support the policy ring fencing North East Sector and would suggest that discussions with neighbouring

authorities to have 2 new neighbourhoods - one East and one West of the town

Officer Response: Noted

Miss Claire Tester

Respondent Ref: 149286

Mid Sussex District Council

Representation Summary: Development of partial neighbourhood is at odds with scenarios 2 and 3. Options 3 and 4 to provide an additional 1 or 2 neighbourhoods onto top of what is already committed appears optimistic given the level of growth planned already and infrastructure constraints that exist. Now that the published South East Plan no longer sets housing figures as a minimum will the 10% contingency still be considered appropriate?

Officer Response: The Council is considering various options, and the options produced are not necessarily compatible, rather they highlight the range of options available to the Council. The Preferred Strategy will provide additional evidence on what level of development and the type that can be supported in and around Crawley. In terms of housing contingency sites, to ensure that the overall housing position is robust, the possibility of alternative contingency sites will be considered, although no site specific decisions have been made at this stage.

Mr Andy Evans

Respondent Ref: 149302

Miller Strategic Land (on behalf of Forest Enterprise, the Lowes family and Miller Strategic Land)

Representation Summary: Responding on behalf of Forest Enterprise, the Lowes family and Miller Strategic Land who control or own the area of land described as East of Brighton Road under Topic Paper 5.

Miller Homes note that the preferred option is to ring fence the NE Sector, which they accept would be appropriate to meet a significant proportion of the requirement, should it be available and deliverable for development. However, pending clarification of the scale and timescale of development there, they argue that the Core Strategy Review must be progressed with contingent provision for meeting the housing provision elsewhere.

In identifying such contingency provision, they do not think the Council can rely upon provision of housing in adjoining Districts, at least pending a redistribution of housing provision under a review of the South East Plan. Specific provision is made for each District in the approved plan. It is not within the remit of a Core Strategy to change this provision.

Instead, they support the concept of the partial neighbourhood to the East of Brighton Road and can confirm that the three parties are working together to enable its delivery. Consider that it would be of sufficient scale to generate provision of some on-site facilities, including local community, retail and primary education provision.

Contrary to the findings of the SHLAA, consider that there are significant opportunities for integration having regard to the major community facilities adjoining the site, such as K2, educational facilities, public transport services and also the proximity of Tilgate and Broadfield.

Note that the SHLAA considers that site is mainly wooded although of a lower quality, such that the loss may be acceptable. In fact, Miller Homes consider that development could result in ecological enhancement of land east of the identified site between the M23 and Tilgate Park. Also, possibilities to meet the energy demands of the development through biomass sourced from local woodland.

Officer Response: The comments are noted. The Council is and will consider a range of options. However, the Council would want to ensure that, whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

Mrs Marian Ashdown
Respondent Ref: 149542
Natural England

Representation Summary: The NE Sector contains a considerable amount of woodland, some areas of which are included on the provisional inventory of ancient woodland for West Sussex. Natural England's view is that ancient semi-natural woods are irreplaceable and must be protected and managed so as to maintain and enhance their special character. If the NE Sector is accepted as a development site, CBC will need to ensure that any development planned does not have an adverse impact on ancient woodland in the area.

Officer Response: The North East Sector proposal is a site deemed suitable for development subject to the resolution of potential noise and operation issues arising if a second runway were to be built at Gatwick. A 1998 planning application for the development of 1900 homes is currently awaiting determination following a Section 78 appeal. The Council expects to receive the decision by November 2009 and the Council will work to ensure that the ancient woodland is protected wherever possible.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: I do not accept that the historic restriction of the area of land provided to Crawley should be a barrier to future housing development or that unwelcome density of development should be created because of a perceived shortage of suitable land. It remains to be demonstrated that the North East Sector can be extensively developed without jeopardising the standard of living in view of noise generated by Gatwick Airport. I would prefer to see much of the area developed as commercial/business areas, with new residential development on the western and eastern outskirts of the town, and no reduction of green space within the historic limits of Crawley. Crawley's current boundaries

are entirely artificial, and have previously been extended. Expansion should again be considered if the town is to grow. I have the strongest objection to references of 'flatted development', Crawley should not become swamped with flats.

Officer Response: Noted. A planning application from 1998 is currently awaiting determination following a Section 78 appeal. The decision on the future of this site is expected by the end of November 2009. In terms of administrative boundaries, the Council must still work to meet the housing requirement within the Borough Boundary (as far as possible), however, joint working with neighbouring local authorities will continue.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: Concern that Reigate and Banstead is already making a major sub-regional housing contribution at Horley and cannot do any more without prejudicing the Metropolitan Greenbelt, particularly in light of higher housing figures set out in the new RSS. Would therefore not support options 3 and 4.. Option 1 would appear to be the most sensible approach given the current uncertainty surrounding Gatwick's expansion needs.

Officer Response: Support for option 1 noted.

Ms Lucy Biddle
Respondent Ref: 150144
RPS (on behalf of Sussex Police)

Representation Summary: We reiterate our concerns over the Council's proposed approach to meeting the South East Plan housing requirement, and its assumption that if the North East Sector is unavailable, a housing shortfall could arise which would not need to be resolved through the allocation of alternative sites. If the site is undeliverable, the SEP Policy

GAT3 is clear that the Council would be required to deliver housing elsewhere in the borough. It is recommended that were the Council to lose the North East Sector Inquiry, the North East Sector site should continue to be identified as an allocation, with alternative allocations to meet a comparable amount of housing identified within the Core Strategy.

The three contingency options identified would each result in a shortfall against the regional housing requirement for the borough. The Core Strategy should avoid reliance on windfall sites to deliver a significant component of the housing requirement, particularly as infrastructure providers will be unable to anticipate the implications of windfall development on their services. Site allocations would provide greater certainty in this regard.

The option to work with neighbouring authorities to deliver a new neighbourhood at Crawley is supported providing that adequate housing is provided to meet the requirement in Crawley, and that any allocations are supported by planning to identify appropriate infrastructure. A policy requirement should be included to ensure that developers contribute towards the necessary infrastructure.

Officer Response: Support for the Council accommodating the South East Plan requirement within the Borough boundary is noted, with or without the North East Sector. The concern that the North East Sector not being available may lead to a sub regional shortfall is noted. The caveats regarding working with neighbouring authorities to deliver the South East Plan requirements are noted.

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: The South East Plan allocation for Crawley Borough is in reality significantly lower than the additional housing required for the town to service the local economy and that of the wider Gatwick sub-region, as proportions of both the Horsham District and Mid Sussex Council's housing requirement reflect additional housing needed

in the Crawley/ Gatwick Area. The 7,500 homes required of the Borough reflects the constrained boundaries of the Borough's administrative area.

Following Adoption of the South East Plan further housing will be needed in the period 2018 to 2026. West of Crawley remains an option for such housing growth, possibly with some additional numbers within the West of Bewbush site. Other options may exist to the east of the M23 (which should not be considered a boundary) within Mid Sussex, the south being constrained by the High Weald AONB and the north Gatwick Airport.

The realistic options to accommodate housing growth within Crawley's boundary are through urban capacity initiatives (ideally based on character appraisals) along with initiatives adjacent to the town through a series of urban extensions, developed in partnership with adjacent Authorities. These should be planned with regard to the potential development of the North East Sector as well as the confirmed development West of Bewbush.

As such, all four options for housing presented will apply, as they are all related and are not mutually exclusive. Adopting all four options would have the added benefit of providing a flexible supply of sites, able to accommodate a range of housing types and tenures. Central sites will lend themselves to higher density apartments/ townhouses, whereas suburban sites and those adjacent to the emerging urban extensions may provide more suitable sites for larger and family housing. The housing strategy must deliver a balanced supply.

Flexibility over affordable housing delivery will be vital, particularly in the early period of the plan as the economy comes out of recession. A further recession over the lifetime of the plan should also not be ruled out. 'Upward' and 'downward' flexibility in the requirement is needed, as are spatial solutions for achieving broad funding to implement social housing. This is particularly the case in Crawley where the requirement of 40% is above the South East regional average.

In parts of Crawley which are characterised by a high proportion of social units, benefit would be gained by introducing market properties, for example in Bewbush. In these cases zero affordable housing

requirements could be considered, in return for additional financial contributions towards regeneration. In this sense the overall impact of development should be the key material factor, in this case qualitative regeneration benefit.

The need for affordable housing within the urban extensions should also be treated with viability in mind. Many schemes have associated infrastructure costs to deliver 'serviced plots' and as such the provision of affordable housing may have to be lower. However, in some circumstances, larger plots or areas may be more viable if a Registered Social Landlord is the lead developer, for example schemes of 60% affordable housing.

Officer Response: The approach advocated regarding the options is noted and the Council will work towards the most appropriate approach in light of site availability and suitability. The Council will look to ensure through the Core Strategy Review that affordable housing continues to be developed to meet the needs of the Borough, but does not undermine development viability and delivery.

Ms Samantha Coates
Respondent Ref: 150243
SEEDA (South East England Development Agency)

Representation Summary: Given the current uncertainty surrounding expansion at Gatwick, SEEDA considers the approach outlined by the Council is appropriate. RES target 9 seeks to ensure sufficient and affordable housing...space of the right quality, type and size to meet the needs of the region and support its competitiveness'. SEEDA consider that the Council should seek to provide an appropriate level of affordable housing of various types and sizes

Officer Response: Support for a mix of housing and affordable housing is noted.

Mr John Phillips
Respondent Ref: 150839
Tandridge District Council

Representation Summary: As regards the boundaries of the North East Sector, the Council's concern relates to the northern boundary. The southern, western and eastern boundaries of the Sector are fixed by physical features of the A2011, railway and M23. As far as this District is concerned, having the northern boundary further to the south of the existing line would have environmental benefits and retain a greater area of open countryside close to Tandridge District which lies to the north east on the other side of the M23.

The Council has concerns based on strategic movement policy grounds. As far as the Council is aware, it still has not been demonstrated that the proposed development is compatible with the transport infrastructure and environmental character in the area, having regard to the likely level of traffic generation from the site and the adequate availability of alternative transport modes.

The proposed development will have a significant cross boundary impact on roads in the District in the vicinity of the North East Sector. For this reason development related benefits should be made including any necessary improvements to the highway infrastructure within Tandridge District in the locality. These improvements would need to include mitigation measures to be carried out to minimise additional traffic in the District using the cross boundary routes in the vicinity of the North East Sector.

It is considered that the area should be protected by including any of the undeveloped land at the site in the Gatwick Greenspace Partnership (formerly the Horley/Crawley Management Project). Such land as is included should be assessed for potential enhancement.

The final concern of the Council is that the boundaries of the site should have soft edges. Together with such soft edges should be reduced

densities at the boundaries which should help to lessen the impact of the proposed development on the area in general.

Officer Response: A 1998 planning application for the development of 1900 homes in the NE Sector is currently awaiting determination following a Section 78 appeal. The Council expects to receive the decision by November 2009. If approved, the Council will then work to ensure the development will deliver the required infrastructure, facilities and services to meet the requirements of the development and mitigate the impact of the development on the local area.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: It appears that the amount of land that still needs to be found for housing has been overstated. The introductory page to Topic Paper 5 states that an allowance has been made for windfall development but the figures quoted in the topic paper itself do not seem to include such an allowance.

The discussion of the key issues relating to housing in the topic paper itself refers to the need to demonstrate contingency. The need to demonstrate contingency has been drawn from the guidance in PPS12 but the percentage range quoted seems to stem from a misreading of PPS3 (further detail supplied).

Need to correct all references to the South East Plan housing requirements being a minima, as this was removed in the final draft of the plan.

WSSC support CBC's preferred approach provided the NE Sector is not ruled out by the possible expansion of Gatwick Airport. Concerned about the infrastructure provision provided by the partial neighbourhood option - would it be commensurate with those provided in a full neighbourhood?

Nevertheless, WSSC consider that this is probably the second most acceptable way forward.

It is not clear that the third and fourth options would be acceptable in principle or to the neighbouring authorities, who would still have to meet their own dwelling requirements elsewhere. In addition, such an approach would need to take full account of the various landscape and other constraints on land adjacent to the town. These options do not compare favourably with options one and two.

Finally, note that an error has crept into the first bullet point about the Northern West Sussex Strategy Market Assessment. The population increase in the first twenty years from 1986 to 2006 was 13.6% and not 20% as stated.

Officer Response: Support for the Council's preferred approach towards the North East Sector is noted. The Council will need to consider what other options are available to meet the South East Plan requirements and what, if any, contingency arrangements should be put in place. However, the Council would want to ensure that, whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

The Council will explore the issues raised in the first and last paragraph in terms of the accuracy of numbers.

Mr J Woolf
Respondent Ref: 151548
Woolf Bond Planning (on behalf of Taylor Wimpey and Beazer Homes)

Representation Summary: Support the Council's preferred option for the development of the North East Sector for 2,700 dwellings. Consider that it is not an option for the Council to 'ring fence' or deduct the North East Sector from the Borough's housing requirement as suggested in the Topic

Paper. The North East Sector allocation forms part of the adopted South East Plan such that it is not an option for the Council to disregard the site.

The North East Sector will provide for 2,700 dwellings and represents a significant proportion of the Council's overall housing requirement during the Plan period. They do not support the relocation or provision of this level of housing in any alternative locations, particularly in neighbouring districts which represent less sustainable options for growth.

Therefore it is considered that there is not justification for excluding the North East Sector from the Borough's housing requirement.

Officer Response: Support for the comprehensive development of the North East Sector noted. Objection to the ring fencing of the North East Sector noted. The Council will consider the implications of the latest North East Sector Inquiry through the formulation of the Core Strategy Preferred Strategy in terms of how the Council address the requirements of the South East Plan.

Mr Keith Wall
Respondent Ref: 151563
Worth Parish Council

Representation Summary: Worth Parish Council strongly supports the Borough Council's preferred option of developing the North East sector to provide 2,700 dwellings.

As to contingencies ('options') 3 and 4, the Parish Council would very strongly oppose any coalescence between Crawley Borough and Worth Parish.

Officer Response: Support for the development of the NE Sector noted.

Objection to options 3 and 4 noted.

Mr J Chessman
Respondent Ref: 151878

Representation Summary: Government prescribed demand puts Crawley planners and elected members between a rock and a hard place, which must inevitably lead to the degradation of the existing layout and open spaces. This will/is taking place by review and change of every open space under control of Crawley Council, plus activities of current planning applications by private developers/speculators. This must lead to a creep to the concreting over of every earth, green/nook and cranny, with high density development. (*previous comments enclosed relating to the above*)

East and West areas are vital to the plan but not immediately. Both are boggy/floody areas and subject to aircraft pollution.

Doubts that east and west areas would be laid out with openness as per Crawley previously, especially at current density rates/car allocation per hectare. One finds it difficult to believe that future residents would want to live in such cramped conditions.

What is more important is getting back to what is happening in the here and now?

Under the control of the Commission for the New Towns the layout of Crawley is the best that Crawley will see. Presumably, despite the present economic situation, most of the 8,000+ dwellings will be built on undeveloped land along the same lines as above.

Can't help feeling that the prescription placed upon the Crawley authorities is a "done deal".

We know from the map and strategy documents that the areas identified for 50 dwellings or more is a depressing one. Their identified plots in the town centre are bizarre, especially 110 dwellings in Station /Friary Way - a thin strip between road and rail, which acts as a comforting open space

in what is already a built up area. East of Brighton Road and part of Tilgate Golf Course are two precious grass/wooded "lungs" destined to be concreted over.

Rationalised to 375 dwellings/annum, the clock is ticking. What the consultation documents do not tell you is how many sites have been identified for less than 50 dwellings (following Council's "call for sites" and other speculative developments). There is no space in recent neighbourhood developments so these developments will be shoe horned into the original open/spacy layouts created by the Commission for the New Towns. Decision makers, please resist these trends - not hopeful.

Officer Response: The Council is required to examine all development opportunities through the Strategic Housing Land Availability Assessment, but the assessment of a site does not constitute the site being suitable for development and the retention of high quality and valued open space forms part of the assessment.

The Council will consider and examine how best to accommodate the housing requirement of the South East Plan, primarily through the Strategic Housing Land Availability Assessment and the *At Crawley Study work*. The neighbourhood and New Town principle remain a critical element of the town's planned future and development proposed within the existing neighbourhoods will seek to respect the existing character and green infrastructure.

Mrs J Raish
Respondent Ref: 152264

Representation Summary: There should be special places for the elderly to live.

Officer Response: The Council will continue to seek to ensure developments provide a mix of housing, which reflects local needs.

Mr Arshad Khan
Respondent Ref: 152280

Representation Summary: Please do not build new neighbourhood in Bewbush West then you would have created concrete jungle, worse than Broadfield. Already there is bumper to bumper traffic jam from Faygate to Southgate. Bewbush West will make the situation worse.

80% of new houses will go to people outside Crawley & Country. I need it on paper that all new homes in Bewbush West neighbourhood will go to people of Crawley.

Officer Response: The Area Action Plan for the West of Bewbush Development has been approved following an Examination in Public. The Council and Horsham District Council are expected to employ their existing nomination procedures to the allocation of affordable housing.

Mrs Eves
Respondent Ref: 152306

Representation Summary: Neighbourhoods should not be vast, the smaller ones work best with a distinct flavour to the area. New housing should be sensitively designed around the existing environment. Transport links need to be good.

The council always focuses on affordable housing at the expense of aspirational housing. There should be fewer houses with large gardens turned into flats, therefore providing pleasant places for people on higher incomes to live and reduce the amount of traffic coming into Crawley in the mornings.

Officer Response: Generally, neighbourhoods should be approximately 2,500 dwellings to ensure a critical mass for the

delivery of services and facilities. However, the Council has not ruled out other options

The Council will continue to seek to ensure developments provide a mix of housing, which reflects local needs and has regard to the development market.

Mr B Wharton

Respondent Ref: 152314

Representation Summary: Crawley was originally well designed but it has been eroded by infilling. What is left should be protected because old building are not being built anymore.

Officer Response: Noted

Mr Tim Hoskinson

Respondent Ref: 150185

Savills (on behalf of the Gatwick Green Consortium)

(For full comments see rep)

Representation Summary: NES should be retained as a strategic housing site pending outcome of Inquiry with option of a partial neighbourhood considered

Only one additional urban extension outside of Borough boundary as all or some of NES should be utilised for housing (depending on outcome of Inquiry)

(further detail in rep)

Officer Response: Support for the North East Sector to be retained as a strategic housing allocation is noted. Partial development of the North East Sector will be examined and explored further through the formulation of the Core Strategy Preferred Strategy.

Mr Derek Meakings

Respondent Ref: 151803

(further detail in rep)

Representation Summary: CBC must ensure that there is prior infrastructure (roads, home zones, doctors, schools, etc) already in place before new and large developments are completed.

It is totally unacceptable for the development to the west of Crawley to be allowed without a western bypass.

CBC must not allow Mid Sussex to dump a new neighbourhood on Crawley (Crabbett Park / east of M23) to satisfy their housing quotas. The Crawley infrastructure/roads etc cannot cope with existing requirements.

The NE sector development must include a full road plan to ensure that the roads in all of the east of Crawley including Gatwick Airport are not brought to a permanent standstill.

All new developments must be well landscaped with open spaces, including retention of existing trees especially on the arterial roads to retain as much of a green town as possible.

Officer Response: New developments will be delivered and planned for to include the appropriate provision of infrastructure, services and facilities to meet the requirements of the development and mitigate their impact on exiting infrastructure, services and facilities. Developments will also seek to maintain the green infrastructure of the town and introduce new landscaping where appropriate.

A 1998 planning application for the development of 1900 homes in the NE Sector is currently awaiting determination following a Section 78 appeal. The Council expects to receive the decision by November 2009.

Mr Tony Fullwood
Respondent Ref: 146753
On behalf of Mrs Williams

Representation Summary: Object to Option 1. The housing requirement is fixed for the Borough in the South East Plan. Whilst the Borough Council may chose alternative locations for meeting the housing requirement, the requirement itself should not be reduced in any circumstances.

Support Option 2. The adopted Core Strategy is subject to an early review, primarily as a result of insufficient housing supply to meet the requirements of the South East Plan. The number of dwellings for the Borough has increased to 7,500 dwellings (375 dwellings per annum) since adoption of the Core Strategy and the Topic Paper rightly identifies the need for an additional contingency on top of the borough target.

At present, the other options appear to accept failure to meet the targets within the borough at the outset. However, in order to be sound, the most appropriate option must be to identify the opportunities which meet the housing requirement within the Borough boundaries.

PPS12 is clear that a Core Strategy is unlikely to be effective if it cannot deal with changing circumstances. If there is uncertainty over delivery, the Core Strategy should aim to meet the targets within the borough but include trigger points for the release of other identified and deliverable land should monitoring indicate such a course of action.

This approach would accord with Para 24.7 of the SE Plan which states that local planning authorities will provide for the level of housing development within this sub-region in accordance with the distribution in this policy. Only in exceptional circumstances can they seek to provide for the balance of their sub-regional requirement in the remainder of their area and only then provided the objectives of the sub-regional strategy can be met.

This option will be given greater opportunity to succeed if the BUAB is not just amended to include large sites (50 dwellings or more), but to enable smaller scale high quality development opportunities (see comments on Topic Paper 10). There has been a very poor response to the SHLAA call for sites and limited sites of a strategic scale have been identified. For this reason, smaller scale contributions, including those enabled by an amendment to the BUAB, must play an important part in achieving the housing target within the Borough.

Object to Options 3 and 4 which seek to meet the projected housing shortfall beyond the Borough boundary. Unless these agreements are already in place, these options cannot be classified as being deliverable.

Detailed comments relating to Land off Saxon Way, Worth (Site 48) in the Strategic Housing Land Availability Assessment - May 2009 Interim Document.

Officer Response: Policies NES1 and NES2 of the adopted Core Strategy allocate the North East Sector for a neighbourhood of up to 2,700 homes and associated uses subject to resolution of a potential second runway at Gatwick. In addition, the Council has consistently maintained that this site would be critical in achieving South East Plan requirement. The Council therefore believes that the option of 'ringfencing' this site, represents a reasonable option at this stage, especially when the delivery of this allocation is subject to a national infrastructure requirement.

Note Support of Option 2.

The options presented are based upon a draft Strategic Housing Land Availability Assessment.

Crawley sits wholly within the Gatwick sub-region and it is not proposed that Crawley's housing requirement should be met outside of the Gatwick sub-region.

The Council has raised the option of working with neighbouring Local Authorities at this early stage because it represents an option

for housing delivery. It is considered unreasonable to expect full agreement between Local Authorities at this early stage in the Core Strategy Review.

Mr Tony Fullwood
Respondent Ref: 146746
On behalf of Mr Robinson

Representation Summary: Object to Option 1. The housing requirement is fixed for the Borough in the South East Plan. Whilst the Borough Council may chose alternative locations for meeting the housing requirement, the requirement itself should not be reduced in any circumstances.

Support Option 2. The adopted Core Strategy is subject to an early review, primarily as a result of insufficient housing supply to meet the requirements of the South East Plan. The number of dwellings for the Borough has increased to 7,500 dwellings (375 dwellings per annum) since adoption of the Core Strategy and the Topic Paper rightly identifies the need for an additional contingency on top of the borough target.

At present, the other options appear to accept failure to meet the targets within the borough at the outset. However, in order to be sound, the most appropriate option must be to identify the opportunities which meet the housing requirement within the Borough boundaries.

PPS12 is clear that a Core Strategy is unlikely to be effective if it cannot deal with changing circumstances. If there is uncertainty over delivery, the Core Strategy should aim to meet the targets within the borough but include trigger points for the release of other identified and deliverable land should monitoring indicate such a course of action.

This approach would accord with Para 24.7 of the SE Plan which states that local planning authorities will provide for the level of housing development within this sub-region in accordance with the distribution in this policy. Only in exceptional circumstances can they seek to provide for the balance of their sub-regional requirement in the remainder of their

area and only then provided the objectives of the sub-regional strategy can be met.

This option will be given greater opportunity to succeed if the BUAB is not just amended to include large sites (50 dwellings or more), but to enable smaller scale high quality development opportunities (see comments on Topic Paper 10). There has been a very poor response to the SHLAA call for sites and limited sites of a strategic scale have been identified. For this reason, smaller scale contributions, including those enabled by an amendment to the BUAB, must play an important part in achieving the housing target within the Borough.

Object to Options 3 and 4 which seek to meet the projected housing shortfall beyond the Borough boundary. Unless these agreements are already in place, these options cannot be classified as being deliverable.

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The Council has raised the option of working with neighbouring Local Authorities at this early stage because it represents an option for housing delivery. It is considered unreasonable to expect full agreement between Local Authorities at this early stage in the Core Strategy Review.

**Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and
Welbeck Land Limited**

Representation Summary: A decision is due to be issued on the acceptability of the NES before the end of 2009, ahead of submission document stages of the CSR review. This decision is likely to provide certainty as to whether the NES can contribute to the Councils housing figures. To this end, the Consortium objects to the ring fencing the housing figures that could be accommodated to the North east sector from the SEP requirement at this stage.

It is accepted that the Borough's preference is to ensure housing delivery within the borough boundary. However, the requirement of policy GAT3 that the majority of future development should be in the form of major developments at or adjoining Crawley should be acknowledged in the CSR. The uncertainty surrounding housing delivery within the borough boundary also suggests that there is a need for policy support within the CSR for major development adjoining as well as at Crawley. Therefore agree with options 3 and 4 of TP5.

Does not support option 2. Would contradict the Councils stated aim of protecting and reinforcing the neighbourhood and new town principle upon which the new town has been developed. Partial neighbourhoods would result in a lack of services and community benefits that could be delivered as part of one or more complete additional neighbourhoods.

The Consortium questions whether the council may rely on windfall sites to meet housing targets in light of para 59 of PPS3. para states that windfall sites may not be relied upon in the first 10 years of land supply unless there is genuine and specific evidence which prevents sites from being identified. It is not clear if the Council have such evidence to justify this position.

The consortium welcomes the acknowledgement that West of Ifield, together with Crabbett park, is under detailed consideration with regards to the feasibility and appropriateness of accommodating strategic housing led development. The Consortiums findings will be submitted to the council to inform the CSR evidence base. It is the Consortiums preference that the requirements of policy GAT3 are acknowledged in relation to a further neighbourhood outside of the Boroughs boundary and that policy is created to inform any such proposals.

Officer Response: It is considered that it is reasonable to raise all feasible housing delivery options at this early stage of the review, including 'ringfencing' the North East Sector as set out in Option 1. Option 2 raises the option of partial neighbourhoods and whilst delivery of partial neighbourhoods would be a departure from adopted policy, it does have to be examined in considering the Borough's housing requirement subject to the North East Sector Inquiry decision. Options 3 and 4 acknowledge the 'at Crawley' issue and the potential for neighbourhoods beyond Crawley's administrative Boundary, however further work is required to see if these options are feasible.

Furthermore, the Council is not suggesting that windfalls form part of the supply in the first ten years, and has further work to complete to see if this approach is reasonable.

**Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport**

Representation Summary: Gatwick is a particularly interested party in relation to this Topic Paper due to the close proximity of the NES to the existing airport and, secondly, the Government's stated requirement, as set out in the 2003 Air Transport White Paper (ATWP)

The requirements to keep open the option for a second wide spaced mixed mode runway has wider implications than simply safeguarding the area of land that would be physically required for the airport's development. Specifically the protection of the runway option has implications on the acceptability of noise sensitive development in areas that will be subject to significant changes in their exposure to aircraft noise outside the expanded airport boundary, such as the NES. These concerns form the main focus of this submission on TP5.

The existence of a developed NES would not only be prejudicial to the option of a second wide - spaced runway at Gatwick but would be incompatible with the adopted LDF core strategy and proposals map. It is our opinion that the CSR should not alter adopted CBC LDF policy position on this specific mater.

In summary:

- Progress in delivering the policy, and future prospects (in a potentially more competitive airport environment) suggest that the likelihood of a runway being needed at Gatwick is at least as great, if not greater, now as it was in 2003 when the ATWP was published
- The noise impact of the second runway, occurring in the NES, would exceed the level specified in Government Guidance (PPG24) as that acceptable for noise sensitive development.
- The noise impact on a previously developed NES would, in the event of a subsequent proposal for a second Gatwick runway, be prejudicial to the success of a planning application for a wide-spaced, mixed mode runway, potentially necessitating the selection of some other option, offering less airport capacity and reduced economic benefits to the nation, and consequently not fully compatible with the conclusions of the ATWP. The NES's presence could cause the outcome of a 'comparative evaluation of alternative runway options' to be less

advantageous to pre existing communities than in the absence of a NES. We therefore do not support the option presented in TP5.

- The need to be mindful of the considerable weight which should be afforded to the requirement of national airports policy. The safeguarding requirement is specified in a White Paper and carried through into other policy documents such as the Regional Spatial Strategy is of such importance as to be the subject of a forthcoming national policy statement, demonstrates that it should be accorded more weight than policies relating to housing provision in Crawley.

(See original rep for detailed Gatwick response)

Officer Response: Noted.

TOPIC PAPER 6 – EMPLOYMENT

Mrs Pippa Aitken

Respondent Ref : 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: "The HCA considers that the Borough Council's approach to employment provision should comprise a hybrid of "smart growth" together with a strategic employment allocation.

In the context of this approach, the HCA notes that the Topic Paper does not link the provision of a strategic employment location to the provision of major new areas of housing at or adjoining Crawley, as required under Policies GAT2 and GAT3. In the interests of achieving sustainable development, the HCA considers that this link needs to be made more explicit in the next stages of the Core Strategy Review. The Topic Paper acknowledges that identification of a strategic employment location will involve working with neighbouring local authorities, and the options being considered in the Housing Topic Paper also include consideration of new neighbourhoods in adjoining areas.

The HCA's predecessor, English Partnerships, has in the past commissioned work to assess the need for a strategic employment location to capitalise on the area's strengths arising from its proximity to Gatwick airport. It remains of the view that there is a need for a different kind of employment "offer" from that provided by Manor Royal and the Town Centre, and this is likely to require a Greenfield site."

Officer Response: Note support of hybrid approach to strategic employment allocation and smart growth

The ELR is assessing the employment land in terms of requirement, mix and location.

The Core Strategy review will have regard to balancing employment land and housing supply in the context of the evidence base, cross authority working and having regard to the South East Plan.

Mr Andrew Gale

Respondent Ref: 147975

Drivers Jonas (on behalf of Universities Superannuation Scheme)

Representation Summary: USS has commercial assets at Denvale Trade Park on Haslett Avenue which is allocated currently as a main employment area and policy E2 supports employment (re)development and intensification of existing employment sites at these locations. USS generally agrees with the potential policy direction for a sub regional and borough approach with Crawley as a strategic employment location. USS would encourage flexible employment uses in designated employment areas to ensure a range of uses would be acceptable in already established employment sites. USS agrees that Smart Growth should be at the heart of the development driver.

Officer Response: Note preferred approach with Crawley as strategic employment location.

Note support of 'flexible' approach to employment uses and designations, which the Council acknowledges draft PPS4 suggests.

Note support of SMART growth.

Main employment areas will be re-assessed as part of Employment Land Review to inform the Preferred Strategy Core Strategy.

Mr Peter Minshull

Respondent Ref: 148635

Highways Agency

Representation Summary: The HA is generally supportive where employment areas are positioned in locations that are accessible by public transport within urban centres. These will be expected to

encourage a modal shift to non car based modes of travel through the provision of alternative modes.

Sites proposed in close proximity to Strategic Road Network Junctions will require careful consideration of likely employee travel patterns and the development of tailored demand management measures. The relevant policy will be expected to mitigate any residual impact upon the network, whether caused by a specific site in isolation or in combination with others.

Officer Response: The HA will be engaged at all stages in the formulation of the Core Strategy and Transport Strategy, particularly if proposals are included that will increase pressure on the existing road network. Infrastructure provision and funding will be considered at Preferred Strategy stage as part of the infrastructure and implementation plan.

Mrs Barbara Childs
Respondent Ref: 148734
Horsham District Council

Representation Summary: Wish to see a collaborative approach continues through the emerging joint Employment Land Review and the consultation version of PPS4. In light of this, HDC would support the hybrid approach of the options preferred by the council.

Officer Response: Note support of hybrid approach.

Note support for collaborative working between LAs.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: There has always been a danger in concentrating on one industry, in our case the airport. If/when this industry fails, the impact on the town's employment will be serious. There are advantages in spreading employment around the town provided the public transport can support this, though it should be remembered that the industrial estate is part of the original new town plan, and may count as part of it's heritage.

There may be a case for spreading employment around the town a little more. A better distribution of light industry/employment in the neighbourhoods would assist in supporting the finance of shopping in the neighbourhoods, e.g. employees shopping during lunchtime, and could lead to a reduction of rush-hour car movements to Manor Royal.

A part university would be a good idea, attracting new people to the town, providing diversification, and reducing the need to move outside the town for higher education.

Officer Response: Note support for diversification of employment sectors to avoid over reliance on airport related sectors.

The ELR is re-assessing employment requirement, mix and location across the Borough.

Note support of a Higher Education facility.

Mr Christopher Francis
Respondent Ref: 148841
West and Partners

Representation Summary: We confirm support for a core strategy that will provide opportunities for innovation and encourage the promotion of smart growth in terms of promoting site availability, allocation and economic growth. This will be achieved by the designation of Crawley as a sub regional strategic employment location which will encourage the

development of high quality grade A office accommodation which will be attractive to inward investment.

Officer Response: Note support of Crawley as sub regional strategic employment location.

Note support of SMART growth.

Note importance of inward investment and grade A office development.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: Hybrid option is the right policy direction.

Three Bridges Corridor development should be planned for and the policy on the use of Industrial land should be relaxed with more mixed developments allowed.

Officer Response: Note support for allowing more mixed use development in Three Bridges Corridor.

The ELR is re-assessing employment requirement, mix and location across the borough.

Mr Dennis Pope
Respondent Ref: 149435
Nathaniel Lichfield and Partners (on behalf of GlaxoSmithKline)

Representation Summary: Manor Royal should continue to be supported as the sub regions main employment area and Crawley should remain the heart and driver of the sub region. A hybrid approach to inform policy

direction should be adopted which includes Smart Growth and a strategic approach to employment growth which would allow growth without undermining existing employment areas and town centres. Manor Royal Regeneration Improvement project should continue to be supported. A more flexible approach to employment uses within defined employment areas should be encouraged to enable a better response to market conditions (eg policy E2) / inconsistency between current development pipeline and current market demand in line with emerging PPS4 guidelines to both plan making and in Development Control. Given the uncertainty over development at Gatwick, it should also be ensured that employment uses at Manor Royal are not protected just for airport related uses

Officer Response: Note support for hybrid policy approach.

Note support for Smart Growth and diversification of employment sectors to avoid over reliance on airport related sectors.

The ELR is re-assessing employment requirement, mix and location across the borough.

The Manor Royal Improvements Master planning project has been commissioned with the report expected in December 2009.

Note support of 'flexible' approach to employment uses and designations, which the Council acknowledges draft PPS4 suggests.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: Apart from Gatwick Airport, there is no local reason or opportunity to invest in employment in the Crawley area. Crawley industrial estate provides less employment than it has in the past. I would question the suggestion that a higher education facility would generate significant employment.

Officer Response: Disagree that there is no reason that employment should invest in Crawley. Manor Royal is still a key part of the employment sector in Crawley, as is Gatwick Airport.

Note concern regarding Higher Education facility

Ms Joyce Wong

Respondent Ref: 150011

Rapleys (on behalf of T&L Crawley LLP)

Representation Summary: This response has been prepared on behalf of T&L Crawley LLP the landowner of the County Oak Business Centre (COBC), which lies within the designated County Oak Employment Centre in the Core Strategy. The COBC currently comprises of a mix of light industrial / warehouse and office uses but has remained substantially vacant. Consequently, Rapleys (on behalf of T&L Crawley LLP) have met with CBC to discuss the site's potential for an alternative use, specifically convenience retail.

T&L Crawley LLP is supportive of a proposal to adopt a more flexible policy approach for the use/re-use of employment land for alternative uses (such as retail) that nevertheless provide opportunities for appropriate economic development. This approach would facilitate landowners to bring vacant/underused or derelict sites back into beneficial use thereby contributing to overall economic growth.

T&L Crawley LLP consider that this approach is justifiable, particularly in respect of the COBC, when taking into account the following:

- Commentary within industry publications reporting that there is a surplus of office accommodation.
- The Manor Royal Study indicates that this important employment provision is deficient in retail/amenity uses.

- The potential consideration/promotion of Manor Royal Industrial Estate as a strategic employment location could allow a more flexible approach towards other employment sites.

Officer Response: Note support of 'flexible' approach to employment uses and designations, which the Council acknowledges draft PPS4 suggests.

The ELR is re-assessing employment requirement, mix and location across the borough.

The Manor Royal Improvements Master planning project has been commissioned with the report expected in December 2009.

In tandem with the ELR and the Manor Royal masterplan the Council will assess retain need through a Retail Health Check to inform the Core Strategy review.

Mrs Julia Dawe

Respondent Ref: 150037

Reigate and Banstead Borough Council

Representation Summary: Object to the unqualified growth of Crawley. Redhill is also a Primary Town centre and a Regional Hub, located only 10 miles to the north of Crawley. Expansion of Crawley should be considered in line with its juxtaposition with Redhill and should be viewed in a complimentary, rather than competitive manner. Supports "Indication of the Potential Direction at this Stage" although the form of the policies that may achieve this is not clear.

Officer Response: Note objection to the unqualified growth of Crawley.

Note support of indication of the potential direction at this stage.

Ms Lucy Biddle**Respondent Ref: 150144****RPS (on behalf of Sussex Police)**

Representation Summary: Sussex Police has no preference between the options available for delivery of employment growth within Crawley, though would recommend that the Council consider proposed locations of employment sites with respect to opportunities for crime. Locations which are readily accessible to motorway junctions can be a convenient target for criminals, and Sussex Police recommend that large-scale employment sites are located away from these areas. Large-scale employment sites can also be targets for crime due to limited hours of occupation, and mixed-use schemes should be encouraged where possible.

Where large scale employment schemes or plan-led regeneration is proposed, early discussions with Sussex Police should be encouraged to identify whether there is need for an on-site police facility. The police should also be consulted during the Masterplanning of employment areas. Regard should also be given to the capacity of the police to serve new employment sites, and the need for developer contributions to be directed towards the Police Service to increase police infrastructure commensurate with the level of proposed development.

Officer Response: The ELR is re-assessing employment requirement, mix and location across the borough.

The Manor Royal Improvements Master planning project has been commissioned with report expected in December 2009

Mr Charles Collins**Respondent Ref: 150201****Savills (on behalf of Crest Nicholson Developments)**

Representation Summary: 1. Should the current Core Strategy policy of retaining employment land be continued?

Emerging PPS4 and South East Plan policy RE3 clearly require an adaptable and flexible approach to employment land, the objective being job creation and additional Gross Value Added. The principle of achieving a healthy supply of employment, in accessible locations should be pursued, therefore releasing land elsewhere for other uses, such as the necessary residential development. The focus for the urban extensions should continue to be residential.

2. Despite the continued uncertainty regarding the sale and possible expansion of Gatwick Airport, there are still challenges relating to the economic implications, such as should the airport play a bigger role as an employment location?

Gatwick Airport is clearly one of the main economic drivers in the area with the growth and opportunity in the Gatwick sub-region fuelled by the Airport. This includes the renaissance of the Town Centre, wider town regeneration and the development of sustainable urban extensions.

3. The Gatwick Diamond has increased in prominence, should this be a key economic driver for the Borough?

The regional and sub regional planning policies and wider regional economic development strategies should drive the spatial strategy. Option 1 of the three possible options at the strategic level is favoured. By recognising that Crawley functions as a key part of the wider South East region including in process terms through joint working, the delivery of development and the South East plan objectives will be greatly assisted. In economic/housing market and transport terms, the wider areas are clearly interrelated.

4. A campus style university at Crawley is referred to in regional planning guidance. Could a university be deliverable at Crawley and would it be beneficial in addressing the skills deficit in the town?

The aspiration for a university presence is strongly supported given the likelihood of economic benefits which would arise. The Core Strategy

should though be clear on the methods/ mechanisms available within the planning system to attract such a use.

5. The Three Bridges Corridor has an important economic function in the town, despite it being largely low grade / informal employment. Should this area remain as it is or should it be outlined as an area of redevelopment?

The opportunity to utilise existing sites for employment, or mixed uses purposes should be factored in order to maintain a healthy supply of employment land within the Gatwick sub region. Opportunities exist for residential development on the edge of Crawley, including westward and eastward urban extensions. Whilst it is accepted that these sites cannot contribute to the overall housing requirement for Crawley, it is important that sufficient jobs are created to enable new and existing communities to thrive.

Officer Response: Note support of ‘flexible’ approach to employment uses and designations, which the Council acknowledges draft PPS4 suggests.

Note commentary regarding the function and role of Gatwick. The ELR is re-assessing employment requirement, mix and location across the borough

Note preferred approach with Crawley as strategic employment location

Note support of a Higher Education facility and the requirement to be certain regarding the delivery of such a facility.

The ELR is re-assessing employment requirement, mix and location across the borough.

Note support of ‘flexible’ approach to employment uses and designations, which the Council acknowledges draft PPS4 suggests

The Manor Royal Improvements Master planning project has been commissioned with report expected in December 2009

**Ms Samantha Coates
Respondent Ref: 150243
SEEDA (South East England Development Agency)**

Representation Summary: Crawley has the potential to act as a catalyst to stimulate prosperity across the wider sub region as well as offer further sustainable growth based on targeted investment in infrastructure. The Gatwick Diamond GROW group is currently considering the potential for developing Gatwick Green but the topic paper makes no direct reference to Gatwick Green. SEEDA reserves the right to comment further at a later date subject to further work being undertaken by the GROW group. The ELR and GVA Grimley report for Gatwick Diamond identify a reliance on aviation industry, low knowledge economy representation and development pipeline not necessarily reflecting commercial floorspace demands within the borough. The RES adopts the objective of Smart Growth. SEEDA would welcome an approach that would promote the knowledge economy of the sub region, promote opportunities for innovation and facilitate higher and further education provision.

Officer Response: The Council does not identify specific sites for strategic employment locations as it is still assessing options as part of the At Crawley study and the ELR.

The Council will engage fully Grow group and the sub LDF group to ensure as far as possible objectives are realised.

The ELR is re-assessing employment requirement, mix and location across the borough.

Note support of a more varied or ‘flexible’ approach to employment use (draft PPS4 already suggests this approach) and Smart Growth. Also note support of a Higher Education facility

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: Agree with continuing smart growth approach. The Core Strategy Review should look to continue with objectives to diversify the economy and reliance on aviation, encourage high value firms, which needs to be linked with skills provision. That said, the development of existing industrial estates to provide high quality sites and premises to assist with this should not preclude the retention and further provision of small affordable units, and encouragement of start ups. Manor Royal has changed over the years and is likely to continue to adapt in order to keep up with current business demands and should continue to be an employment site but caution over the introduction of employment uses other than B1-8.

The uncertainty about the need for flexibility is likely to remain until PPS4 is finalised. Therefore, there will continue to be a need to retain those realistic, available sites for B1-8 uses, providing that the sites are considered realistic and marketable. The pressure seen in recent years from other more lucrative land-uses, such as housing, has been very strong on existing employment land. In the interests of developing Crawley's economy and encouraging higher value industries it is vital that opportunities for B1-8 uses are not compromised in any way.

There are uncertainties around Gatwick that are not only related to the possibility of a second runway - issues over whether or not its being sold and to whom and in turn, the implications of Gatwick's own development strategy.

There is no mention of the links to the wider regional economy, including that of inner south London, which could have implications for employment growth in Crawley/Gatwick.

Crawley has the highest proportion of employment in the knowledge based sectors in WSCC - the issue is around maintaining and expanding this sector and what it needs to attract more high value business to Crawley (e.g. links to skills, training, suitable land and site provision).

A higher education facility in the town is supported - the skills profile of Crawley residents is low compared with the county as a whole and there must be encouragement to improve them at all levels.

Officer Response: Note support for Smart Growth and diversification of employment sectors to avoid over reliance on airport related sectors.

The ELR is re-assessing employment requirement, mix and location across the borough. The Manor Royal Improvements Master planning project has been commissioned with report expected in December 2009

Note support for retaining B1-8 uses and note concern relating to 'flexible' approach to employment use as set out in draft PPS4

The ELR is re-assessing employment requirement, mix and location across the borough and the impact of Gatwick (and possible changes at Gatwick) will be taken into through the Core Strategy Review in consultation with BAA

The Council continues to work as part of the sub region and the Gatwick Diamond work includes consultation and regard to some of these wide areas.

The ELR is re-assessing employment requirement, mix and location across the borough. The Manor Royal Improvements Master planning project has been commissioned with report expected in December 2009.

Note support for increasing the knowledge economy sector and providing a Higher Education facility.

Mr Tony Leppard
Respondent Ref: 151613
FMX Ltd

Representation Summary: We are keen to expand our business, and have recently acquired 3.5 acres of land to the north and west of our current premises at Westfield House, Bonnetts Lane. The land is accessed from Charlwood Lane. We are keen to open discussions with regards expanding our facilities to incorporate a six building campus across the whole site (including Westfield House) to accommodate future research and development inclusive of accommodation for overseas trainees and support staff.

Officer Response: The ELR is re-assessing employment requirement, mix and location across the borough. Any proposals for this location will have to have regard to Gatwick safeguarding and currently being a countryside location.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: It was noted that there were a shortage of highly skilled workers living within the borough.

Officer Response: The ELR is re-assessing employment requirement, mix and location across the borough

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Crawley has for decades been known for having low unemployment and it already has numerous shops, office

blocks and industrial areas, plus Gatwick. Crawley's problem is ever more people require more ever more employment facilities. It is a vicious cycle - how to expand the economy without causing continued population increase?

Officer Response: The Core Strategy Review through the ELR and At Crawley Study will seek to balance employment development with housing development in accordance with the South East Plan.

Mr Tim Hoskinson
Respondent Ref: 150185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: Should not necessarily retain all previously allocated employment land as now may be more suitable for alternative uses including residential. Careful consideration of all employment land should be undertaken to determine its suitability according to SEP.

Gatwick Airport should primarily play a role as an operational airport with restricted non airport employment uses within its perimeter. However it is clear that an airport can play a key role as catalyst for economic growth *(further detail in rep)*.

The Gatwick Diamond is a key economic driver for the Borough and the Diamond Initiatives work should be closely integrated into the production of a suitable planning strategy *(further detail in rep)*.

The concept of a campus for Crawley is one that should be examined fully through the plan process *(further detail in rep)*.

Whilst the Three Bridges Corridor has some potential for improvement there is a role for all types of employment uses across the land use spectrum. There is a case for existing general industrial sites to be retained *(further detail in rep)*.

Manor Royal is a large established and important employment quarter of Crawley. It plays a major role in the economy of the sub region. Whilst it has some potential for improvement, there is an ongoing role for all types of employment uses for Crawley in its important sub regional role (*further detail in rep*).

Officer Response: The ELR is re-assessing employment requirement, mix and location across the borough.

Agree that Gatwick has a key role in the Crawley and sub regional economy. The ELR is re-assessing employment requirement, mix and location across the borough, including the role of Gatwick as a commercial location not necessarily linked to airport operation.

The Council continues to work as part of the sub region and with the Gatwick Diamond.

Through the formulation of the Core Strategy we continue to engage with the various stakeholders seeking to develop Higher Education facilities within the town.

The ELR is re-assessing employment requirement, mix and location across the borough, including the policy approach towards existing site retention or release and the possible role of a Strategic Development location.

The Manor Royal Improvements Master planning project has been commissioned with report expected in December 2009, which will seek to determine the direction and role of Manor Royal.

**Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and Welbeck Land Limited**

Representation Summary: Supports overarching policy that concludes that employment, retail and the provision of community facilities and services within neighbourhood centres is supported.

Officer Response: Noted

**Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport**

Representation Summary: The airport campus offers a wide diversity of jobs which in turn requires a spectrum of skills sets and capability. We would like to see this diversity supported within the CBC CSR so that we can work jointly with CBC to address their concerns regarding local and sub regional economic deficiencies in particular those relating to aviation reliance for Crawley. We believe that it will be important to develop a joint strategy so that jobs can be retained at the airport to support our sustainable growth objectives. In addition working with education service providers to identify future skills sets required and develop educational offers accordingly. For example working with Gatwick Diamond we have supported the University of Brighton's initiative to develop a university centre in Crawley.

- The airport is a significant generator of economic value for London and the South east economies.
- The airport facilitates trade and contributes to the global competitiveness objective of the South East Regional Economic Strategy of assisting more businesses to operate internationally.
- International visits play an important role in generating economic benefits such as trade, hotel bookings and consumer spend.
- Retention and enhancement of dedicated airport rail links such as the Gatwick express so that it is as attractive both now and in the future will help maintain the region's competitive position.
- Going forward it is important that we build on our strong working relationships with CBC to enable employment levels to be maintained

at the airport and recognise the important economic role that Gatwick plays locally, regionally and at a national level.

(See original rep for detailed Gatwick response)

Officer Response: The Council note the support for continued joint working on economic matters relating to Gatwick and will continue to facilitate and develop existing joint working arrangements.

TOPIC PAPER 7 – TOWN CENTRE GROWTH AND RETAIL

Mrs Pippa Aitken

Respondent Ref: 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: The HCA has a number of land owning interests in the Town Centre, including land which forms part of the Town Centre North (TCN) allocation. In relation to TCN, the HCA considers that the Core Strategy Review should continue to identify it as a comprehensive, strategic allocation, given the timescale of the Core Strategy to 2026, and the role that TCN is expected to play in a sub-regional context, particularly in terms of strengthening the retail element of the Town Centre. However, the Council may wish to give consideration to a number of different mechanisms, including a phased approach, in order to secure implementation of the scheme.

The HCA also considers that other Town Centre development opportunities should be identified in the Core Strategy Review, although it is acknowledged that some of these may be of a scale which may not make them “strategic” allocations. However, in combination, such allocations may be considered appropriate for inclusion in the Core Strategy to demonstrate the role ascribed to the Town Centre overall and the contribution that appropriate development on these sites might make to town centre regeneration and other objectives.

Officer Response: Support noted for the continued identification of a comprehensive allocation for TCN. The Council will explore how different delivery mechanisms might be used to help bring forward the development.

The council is considering allocating the development opportunity sites identified in the Town Centre Wide Supplementary Planning Document (SPD) where they are of an appropriate scale.

Mr Andrew Gale

Respondent Ref: 147975

Drivers Jonas (on behalf of Universities Superannuation Scheme)

Representation Summary: USS would encourage the Council to consider edge of centre locations to be brought forward for employment opportunities when justified given the potential for additional investment and job creation. No specific comments on the town centre opportunities outlined.

Officer Response: The Town Centre Wide SPD identifies development opportunity sites within the Town Centre boundary which the Council will consider allocating where they are of an appropriate scale.

Mrs Barbara Childs

Respondent Ref: 148734

Horsham District Council

Representation Summary: SEP identifies Crawley as a Centre of Significant Change and Horsham as a Secondary Regional centre. Because of this HDC expect Crawley to grow its retail offer, but wishes to see this growth occur in the context of mutually beneficial and complementary retail offers.

Officer Response: Crawley’s retail growth is intended primarily to take expenditure lost to higher order centres elsewhere, not to compete with the more local, market town offer of Horsham.

Miss Alison Coster

Respondent Ref: 148775

Iceni Projects Limited (on behalf of Aviva Investors)

Representation Summary: Iceni Projects Ltd (Iceni) are responding on behalf of Aviva Investors, the owners of Crawley Leisure Park and the adjacent London Road Retail Park (plans enclosed). When the Core

Strategy was adopted in 2007, Crawley Leisure Park was included within the town centre boundary but the Retail Park was excluded.

The Retail Park functions as retail warehouses/bulky retail uses, although one of the units is currently vacant. Aviva Investors consider that the units are showing signs of decline and are difficult to subdivide or reconfigure to meet the needs of many retailers. Therefore, they are keen to regenerate the Retail Park either on its own or as part of a comprehensive redevelopment taking in adjoining land, including Crawley Leisure Park. However, as the site is currently outside of the town centre boundary, it restricts the scope for redevelopment incorporating town centre uses.

In order for the town centre to continue to grow to become the regional retail hub proposed in the South East Plan, Aviva Investors consider that additional sites should be identified for development and regeneration in the medium to long term. Edge of centre sites, such as the Retail Park, should be viewed as the ideal locations for such development as they meet proposals for 'smart growth'. Consequently, Aviva Investors argue that the London Road Retail Park should be included within the town centre boundary to establish the site as being suitable for town centre uses.

Officer Response: Government Planning Policy Statement 6 sets out guidance through which town centre and edge-of-centre boundaries should be assessed. An edge-of-centre location should be determined by local circumstances including a site's physical distance from the town centre and primary shopping area, and the extent to which it is connected to and accessible from the town centre. The Council will consider whether the London Road Retail Park should be included within the Town Centre. However, the retail park is located a significant distance from the primary shopping area, and appears to lack sufficient connectivity to be considered as part of the town centre. Other development opportunity sites within the existing Town Centre Boundary (as identified in the Town Centre Wide SPD) are available for "smart growth" and these may be allocated where they are of an appropriate scale.

**Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee**

Representation Summary: There may be a case for spreading employment around the town a little more. A better distribution of light industry/employment in the neighbourhoods would assist in supporting the finance of shopping in the neighbourhoods, e.g. employees shopping during lunchtime, and could lead to a reduction of rush-hour car movements to Manor Royal. There is some support amongst our group for the current appearance of the Town Hall, and questions have been raised about the justification for its demolition.

Officer Response: The current indicative masterplan for TCN requires retail anchor stores at the eastern and western ends of The Boulevard which means the existing Town Hall will need to be relocated. The building is not considered of sufficient architectural or historic quality to merit retention.

Representation partially relates to employment. See Topic Paper 6 for Officer Response.

**Mr Christopher Francis
Respondent Ref: 148841
West and Partners**

Representation Summary: Confirm support for a core strategy that will promote the town centre to incorporate full mix of uses, fulfilling its role in meeting the needs of the Gatwick Sub-Region, enabling Crawley to compete effectively with high quality public realm and good public transport. The core strategy should be in line with Government guidance so as to provide opportunities for economic growth which will encourage the development of high quality grade A office accommodation attractive to inward investment.

Officer Response: Support noted. The Town Centre Wide SPD identifies development opportunity sites within the Town Centre boundary which may be allocated where they are of an appropriate scale and sufficient evidence of deliverability can be demonstrated.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: Town Centre North development must take into account current economic climate and encourage more non-retail use.

Officer Response: Noted. The Council is exploring how in the light of changes in the economic climate the development can be brought forward.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: I suspect the presently proposed development will improve the 'in town' shopping facility, but I would like to see the neighbourhood shopping parades drastically upgraded to provide an enhanced level of service and provision. Every neighbourhood should have a comprehensive mini-grocery. Many precincts are dominated by food outlets.

Officer Response: The Council recognises the important role of the neighbourhood parades in meeting the day-to-day needs of Crawley residents, and is working to protect and enhance their function. In terms of the planning process, whilst the Council cannot control market forces such as the closure of particular shops, it is anticipated that the Core Strategy Review will include a planning

policy designed to ensure that neighbourhood parades continue to contain a good mix of retail and non-retail uses.

Beyond the planning process, the Council is currently working to improve the physical appearance and function of all parades where buildings and land are owned by the Council, through the Neighbourhood Parade Improvements Programme. Works have been completed or are ongoing at many of Crawley Borough Council's parades, and further improvement works planned for the remainder.

Ms Joyce Wong
Respondent Ref: 150011
Rapleys (on behalf of T&L Crawley LLP)

Representation Summary: Whilst the topic paper does acknowledge that the evidence base identifies significant unmet retail expenditure within Crawley it does not expand further, in terms of the type of retail provision needed or its location.

In these terms, T&L Crawley LLP note that the Retail Study (2005) identifies a significant need for convenience retail floorspace in non-central areas. Consequently, they consider that this requirement should be acknowledged within this Topic Paper and a commitment to meeting this need should also be stated. T&L Crawley LLP consider that the County Oak Business Centre (COBC) provides an appropriate location (noting its proximity to the Manor Royal Industrial Estate and its associate deficiencies) for convenience retail provision. They consider that this would complement the wider function and attractiveness of the area and therefore, request that the Core Strategy Review recognises this permits a site specific allocation.

Officer Response: The 2005 Retail Study does identify unmet expenditure for convenience retail but, in line with PPS6 and the sequential approach, Town Centre sites should be considered first. The Council has, alongside Horsham District Council and Mid Sussex District Council, commissioned a sub-regional Employment

Land Review (Part 1) to assess the requirement for employment floorspace in Crawley. The outcomes of this study, and the undertaking of a detailed location-specific follow-up study, will form a key part of the emerging Core Strategy Review evidence base, particularly with regards the Councils approach to retail and employment locations. A Masterplanning exercise for the Manor Royal Improvement Project has also been commissioned. As such, it is not considered appropriate to explore the potential for retail allocations outside the Town Centre prior to the completion of these studies.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: Object to the unqualified growth of Crawley. Redhill is also a Primary Town centre and a Regional Hub, located only 10 miles to the north of Crawley. Expansion of Crawley should be considered in line with its juxtaposition with Redhill and should be viewed in a complementary, rather than competitive manner. Supports "Indication of the Potential Direction at this Stage" although the form of the policies that may achieve this is not clear.

Officer Response: The current Core Strategy defines the expected quantum of retail growth (50,000sq m) in Crawley, in line with retail capacity studies which recognised the main retail expenditure clawback would be from higher order centres. This work will be updated to support the Core Strategy Review.

Support for potential direction noted.

Ms Lucy Biddle
Respondent Ref: 150144
RPS (on behalf of Sussex Police)

Representation Summary: Sussex Police raises no objection to the Town Centre North proposals, though would encourage the local authority to engage them in the Masterplanning and design evolution of the proposals. We welcome the identified need for high quality public realm, public transport and community safety through the development of the town centre. The Core Strategy should be explicit in the requirements placed upon developers to deliver safe and secure environments in terms of Secured By Design, a visible police presence and funding towards additional policing.

The inclusion of residential uses within the town centre is welcomed to increase surveillance of the area and improve 24 hour use. Expansion of the evening economy must be carefully managed with regard the increased pressures this could place upon the police, and the Core Strategy should recognise the need for developer contributions towards police infrastructure to meet increased need. Where appropriate, the Core Strategy should enable contributions to be secured from applicants for town centre developments.

Officer Response: The Council welcomes the Police support for the broad policy approach set out under this Topic Paper, and supports the request of stakeholders to become fully engaged with the Town Centre North master planning process. It is anticipated that opportunities for involvement will be forthcoming as the scheme continues to evolve, and stakeholders will continue to be informed of progress with this scheme.

The Council has adopted a Developer Contributions and Section 106 SPD. It has not been considered appropriate in the Crawley context to seek contributions to policing. This is because the police are funded through a specific element of the Council Tax which will increase with additional development, and also because it is the Council's current understanding that no further police facilities are currently proposed in Crawley.

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. Should different approaches to the delivery of TCN be considered to progress the scheme?

The delivery of a renaissance of the town centre would clearly enhance the attractiveness of Crawley as a destination and would be in accordance with the Region Hub and Centre of Significant Change criteria of the South East Plan (policies SP2, TC1). TCN should therefore be progressed as a corporate priority of the Council.

2. Should other Town Centre opportunities be formally identified and allocated?

In assessing the need for growth the opportunity for locating appropriate neighbourhood facilities in the suburbs (and with regard to potential facilities within the West of Bewbush urban extension) should be considered. Not all facilities need to be located in the Town Centre and it is important that the network of neighbourhood centres is not blighted.

A mechanism for achieving this may be to relocate centres (or ensure that new centres are located) on main routes, or close to public transport interchanges. The role of appropriately sized supermarkets acting as key anchors to each centre should be recognised. The positive qualitative regeneration factors in terms of the actual impact of such development will become material (as draft PPS4 refers). In this sense competition between supermarkets should be seen as a positive factor and the planning system seeking to guide such uses to the best locations (in economic as well as environmental/ social terms).

3. Should we seek to encourage more non-retail uses and promote evening economy uses? If so, what uses do you think are appropriate?

The offer of night time uses should reflect the needs of all the population. A higher quality evening economy incorporating art and culture as well as bespoke restaurants will increase the overall value and attractiveness of the town, not least the town centre. The Core Strategy, through the infrastructure and delivery background could integrate appropriate town

centre investment funding mechanisms to leverage investment focused on high quality entertainment.

Appropriate A3-A5 and D2 uses should be permitted within the neighbourhoods to promote their vitality and viability.

4. Which parts of the town do you feel are not working and what are the main problems and reasons?

There are areas in need of regeneration including Bewbush and Bewbush centre.

The issues arise possibly due to the tenure mix of the area and perception of poorer quality. Targeted strategies for the ongoing renaissance of these areas should be pursued as part of the LDF framework. This may include more flexible approaches to planning policy, targeted investment, characterisation and environment improvement strategies and section 106 funding mechanisms.

Officer Response: Support noted for the continued prioritisation of the TCN scheme.

The Council agree that the provision of appropriate facilities to meet the daily needs of local residents, through the neighbourhood principle, remains fundamental to the planning and character of Crawley. The provision of convenience retail in the neighbourhood parades plays a key role in meeting local need, though it is vital that such provision remains appropriate in terms of scale, to the function of the neighbourhood centre.

When planning for new neighbourhood development, it is agreed that neighbourhood centres should be accessible through a range of means of public transport, though the Council would not wish to see new neighbourhood centre provision situated in locations, such as on main routes, where accessibility could be restricted through issues of severance.

Support for a higher quality of evening and night time economy use is noted. The Town Centre Wide SPD provides flexibility for a variety of non-retail uses in the town centre, *and* the Council will be reviewing its retail policy through the Core Strategy Review process in order to establish whether further flexibility is appropriate. The Town Centre Wide SPD also identifies a number of opportunity sites with mixed-use development potential, and the Council will be working alongside the Regeneration Board and other partners to deliver these opportunities.

The Council has adopted a Developer Contributions and Section 106 SPD. This document sets out that a developer contributions towards environmental improvements, public art, and additional CCTV cameras will normally be sought from major developments in the Town Centre of over 10,000m² floorspace. The SPD identifies particular Town Centre areas for improvement.

The neighbourhood principle is fundamental to the planning of Crawley, and the Council will work to ensure that the neighbourhood parades continue to meet the day-to-day needs of Crawley residents. It is recognised that non-retail uses can play an important role in meeting local need, and the current policy approach is to apply an element of flexibility when determining applications for change of use from retail on neighbourhood parades, with consideration given to the impact of the proposed use upon the function and viability of the parade. The role of community uses in neighbourhood centres is also important, and applications for such uses will be considered upon their individual merits.

Note comments in relation to Broadfield and Bewbush. Bewbush neighbourhood centre is currently the focus of 'Heart of Bewbush', a major regeneration project, focussed around the provision of a new healthy living community centre, alongside new leisure space, parking facilities, and housing.

Miss Janyis Watson

Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: Recommend that any growth in the town centre is designed in a sustainable manner and within a multi functional green network. This will ensure green infrastructure and biodiversity gains can be delivered in an integral fashion.

Officer Response: The Town Centre Wide SPD emphasises the need to protect existing green spaces, combined with further "greening" particularly in relation to new development. The Council will consider how these principles might be carried forward into the new Core Strategy.

Mr John Phillips
Respondent Ref: 150839
Tandridge District Council

Representation Summary: The enhancement of the Town Centre's role as a major public transport interchange serving the Gatwick sub-region and improving the quality of existing facilities would be supported.

Officer Response: Noted. The Town Centre Wide SPD identifies Station Way and Friary Way as an opportunity area for an integrated public transport gateway/interchange. The Council will work alongside stakeholders to explore opportunities to bring this forward, and through the Core Strategy Review process, will be exploring whether the site should be formally allocated as a strategic site.

Ms Rose Freeman
Respondent Ref: 151043
The Theatres Trust

Representation Summary: This paper mostly deals with retail and hardly acknowledges other 'ingredients' that contribute to Crawley's vitality. Would expect there to be a paragraph on the benefits or limitations of existing facilities and to indicate their protection and enhancement before dealing with future development. The SEP (1.46) states that 'the promotion of tourism and related leisure uses in town centres will assist the diversification of functions and services and the reuse of land and historic and redundant buildings. In turn the provision of new or upgraded facilities supplemented by regular cultural events can help increase the attractiveness of centres not only as places to visit but also places to live and work'. These aspirations are mentioned in the topic paper but only directed at retailing and shops. Would suggest that the other town centre opportunities section is expanded to deal with current assets of the town including the theatre (as mentioned by Inspector in CS report 2007).

Officer Response: Noted. It is recognised that in order to remain a healthy and viable town centre, Crawley should contain a good mix of uses beyond solely retail, though it is important that non-retail uses do not come to dominate the town centre to the extent that it vitality and viability is compromised. Through the Core Strategy and Town Centre Wide SPD, the Council has sought to apply greater flexibility to the type of uses permitted within the town centre, including health, leisure, catering, and financial and professional services. Through the process of the Core Strategy Review, it is intended that a further review of retail policy will be undertaken, with particular consideration to be afforded to the role of promoting the evening and night-time economy.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: Any town centre should provide for a mix of uses - retail as well as commercial, leisure, community, civic and housing etc. therefore a comprehensive approach to TCN, securing a mix of uses

should continue. It would link in with encouragement of evening economy uses providing the associated infrastructure is in place.

Neighbourhood parades should offer uses to meet with residents' needs including convenience shops - whilst the retention of such uses (A1) is vital, it is difficult to provide such a use if it is not commercially viable.

Officer Response: Support for continuing the comprehensive approach to TCN, and for the neighbourhood parades noted.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: Make Town centre as pleasant as possible, perhaps pedestrianising boulevard and keeping as a tree lined avenue. Provide town centre museum.

Provide low cost, start-up retail outlets so that local people can start their own businesses.

Officer Response: The Town Centre Wide SPD, and the Town Centre North proposals aim to improve the environment and the retail attractiveness of the Town Centre. The Council is exploring options for a museum.

The Council owned neighbourhood parades provide lower cost retail units but CBC has very limited ownership in the Town Centre.

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Redevelopment is fine, you can build higher in the town centre, diversify the economy. But the idea of tower blocks of flat is a very bad idea - people should not be crammed in like sardines without and green spaces and surrounded by other large, buildings, busy,

noisy roads and a tons of people milling around that is not residential. No more shops the county mall is massive, plus you already have the original town centre and the leisure park; we have massive sprawling town centre. Shops encourage the low paid low skilled work that Crawley is known for and I know the council wants to change that via a university.

Officer Response: The 2005 and 2006 Retail Studies identified significant capacity for retail growth, and higher order shops, in Crawley in order to clawback retail trade lost to other centres. This work will be updated to support the Core Strategy Review. Direct retail employment is often comparatively low skilled, but enhancing the attractiveness of the Town Centre should encourage investment by other employers. The Town Centre North SPD emphasises the need for the design and layout of the scheme to protect residential amenity and create an appropriate residential environment, including private outdoor space.

Mr Tim Hoskinson

Respondent Ref: 150185

Savills (on behalf of the Gatwick Green Consortium)

(For full comments see rep)

Representation Summary: TCN will accommodate some types of employers for whom a town centre location is suitable. The proposals for a strategic employment location at Gatwick Green will complement, rather than compete, with TCN. A mix of uses, including retail, residential and night time economy are appropriate in order to secure a vibrant future for town centres (further detail in rep)

Officer Response: Noted. TCN, and the Town Centre as a whole, is an appropriate, sustainable location for high quality office provision. The Council has, alongside Horsham and Mid Sussex District Councils, commissioned a sub-regional Employment Land Review (Part 1) to assess the requirement for employment floorspace in Crawley. The outcomes of this study, and the undertaking of a detailed location-specific follow-up study, will form a key part of the

emerging Core Strategy Review evidence base, particularly with regards the Councils approach to retail and employment locations.

Mr Derek Meakings

Respondent Ref: 151803

Representation Summary: TCN development must have a full independent traffic plan with public specific consultation covering access thru the town centre and all neighbourhoods BEFORE the plans for the shops are developed. CBC must not pass the responsibility to the developers and WSCC traffic team. With the delay to the development any plans to destroy the trees in the Boulevard should be reconsidered.

Officer Response: A full Traffic Impact Assessment will be required to support the planning application for the TCN scheme and this will be publicly available. Revised delivery mechanisms and layouts are being explored.

Mr Michael Fearn

Respondent Ref: 150292

Shire Consulting (on behalf of Barclays Bank)

Representation Summary: Substantial qualitative and quantitative improvements are proposed for the Council's main central area over the plan period. Other supporting services should also be part of any increase in central area floorspace, and improvements to shopping provision should be matched by commensurate improvements to financial services provision. The Bank supports the Core Strategy in seeking to direct development towards sustainable locations such as town centres.

The Core Strategy Review provides an opportunity to reappraise out of date policies. Greater encouragement should be given to non-shop uses, as by definition any use that falls within Part A of the Use Classes Order is appropriate in a town centre. The Bank believes that there is no good reason to restrict the presence of banks at ground floor level in any

shopping frontages, and planning policies should make clear that Class A2 financial services retailers such as banks and building societies will be appropriate uses, with sufficient flexibility encouraged to allow change of use between A1 and A2 use classes.

Officer Response: Noted. It is recognised that in order to remain a healthy and viable town centre, Crawley should contain a good mix of uses beyond solely retail, though it is important that non-retail uses do not come to dominate the town centre to the extent that its vitality and viability is compromised. Through the Core Strategy and Town Centre Wide SPD, the Council has sought to apply greater flexibility to the type of uses permitted within the town centre, including health, leisure, catering, and financial and professional services. Through the process of the Core Strategy Review, it is intended that a further review of retail policy will be undertaken.

Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and Welbeck Land Limited

Representation Summary: Supports overarching policy that concludes that employment, retail and the provision of community facilities and services within neighbourhood centres is supported.

Officer Response: Support for the provision of appropriate employment, retail and community facilities and services within neighbourhood centres is noted.

TOPIC PAPER 8 – TRANSPORT

Ms Samantha Brown

Respondent Ref: 147280

Crawley and Gatwick Chamber of Commerce

Representation Summary: Agrees that the Crawley Transport Policy needs to be better integrated as well as cooperation with Network Rail and Metrobus to bring this about, particularly in the Three Bridges and Town Centre areas. Supports the concept of a Park and Ride from west (of Bewbush) and east (of M23) to town centre. Monitoring of transport to, from and within Crawley and wider area should be on going particularly due to new developments

Officer Response: Once the Council has developed a comprehensive Transport Strategy for the Borough with its partners, it will ensure that it is kept up-to-date.

Note support for Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

Mr Peter Smith

Respondent Ref: 147686

Cycling Touring Club (CTC)

Representation Summary: "Crawley is an ideal area for Cycling both in terms of its relatively compact area, its geography and its population density. It would be relatively straight forward to encourage more cycling, if done properly and the 'natural features' area ideal for large increases if desired.

Encouraging cycling provides excellent value for money in terms of walking and cycling schemes with relatively low capital costs, incremental in nature and good cost benefit ratios. What is needed is to have the will to promote cycling rather than massive funding. CTC recommends CBC

incorporates support for significant increases in cycling in Crawley and produces a Crawley-wide cycle strategy.

CTC have provided a detailed response on aspects of the Borough's cycle network. "

Officer Response: Agree with the CTC's view that cycling should be encouraged in Crawley. The Council will continue to work with the CTC, WSCC and the other cycling groups in the area on a regular basis to address the various issues raised in this representation and to improve the borough's cycle network.

Mrs Pippa Aitken

Respondent Ref : 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: "In the HCA's view, this needs to be considered at both a Crawley-specific and sub-regional level, having regard to the issues raised in both the Housing and Employment Topic Papers concerning the potential need for new neighbourhoods and a strategic employment area. The location of such development must be informed by, and inform, ongoing transport studies. In particular, if there is to be further development west of Crawley, the Core Strategy Review must consider the infrastructure requirements of such development. The longstanding objective of West Sussex County Council to achieve a Western Relief Road is no longer supported in policy terms, because the West Sussex Structure Plan, which has provided context for the Crawley and Horsham Core Strategies, has now been superseded by the adopted South East Plan. Furthermore, there is now a clear deadline for this issue to be addressed in the light of the West of Bewbush JAAP Inspector's recommendations.

The HCA supports the bullet points listed under the Indication of the Potential Direction at this Stage, in particular the importance of policies encouraging sustainable modes of transport. However, in relation to transport infrastructure, the Council will need to clearly identify the parties responsible for delivering such infrastructure, the timescales for so doing,

and the means of funding. On this last point, it should not be assumed as seems to be the case in relation to the penultimate bullet point that it is only developer contributions that will enable infrastructure to be brought forward; all sources of funding need to be identified."

Officer Response: Agree, that the Transport Strategy will need to consider Crawley's role in the strategic transport network, as well as issues related specifically to the borough.

Note comments in relation to relief road. This will be considered as part of the Transport Strategy.

Once completed, the Transport Strategy will form part of the evidence base for the Implementation Plan being prepared to accompany the Core Strategy Review. This will need to include funding mechanisms, timetables, delivery agencies etc.

Mr Peter Minshull
Respondent Ref: 148635
Highways Agency

Representation Summary: The implementation plan will need to consider how development at Crawley can be delivered ahead of any major improvements, possibly with smaller, developer led improvements.

The HA supports the development of a transport background study and would wish to work with CBC to ensure that it does provide a robust assessment of the transport implications of the Core Strategy Review. The HA is also supportive of transport issues being integrated into the other areas to encourage sustainable living patterns.

The transport policies should seek to encourage increased use of sustainable transport and compliment the land use policies by minimising demand at the source (e.g. reduction in car parking). The HA would support the concept of Park and Ride in principle but consideration should be made of the impact on the trunk road through a transport assessment.

The HA would strongly urge that all allocated developments are provided with clear policy advice about the need to manage the growth in traffic demand that will result from the proposed sites and to mitigate their impacts where necessary.

Due to the delays with CIL it will be necessary to include both the provisions for both CIL and planning obligations and section 106 agreements in the Implementation plan until a singular approach is established.

If CBC wishes to reduce the number of policies then it must ensure that in doing so it does not omit any important issues or lose focus on important issues.

Officer Response: Welcome involvement of the Highways Agency in the development of a Transport Strategy for the borough. It is intended that sustainable modes of transport will be encouraged and the Council will try and work with the Highways Agency to identify the best way of achieving this.

The Council will also work with WSCC to ensure that there is a robust transport policy framework in place.

Note suggested approach with regards to CIL.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: Encouragement of environmentally-friendly transport should take precedence over discouragement of un-environmentally friendly travel. Cycling should be encouraged, and better cycle paths, cycle racks at local shops within the town centre, and the provision of lockers for cyclists in town centres would all assist. Existing residential roads need traffic calming deterrents, IVCAAC is aware that

new development around the conservation area has turned roads such as Rusper Road and Ifield Green into rat-runs.

Officer Response: Agree that sustainable modes of transport, such as cycling, should be improved.

Mr Christopher Francis
Respondent Ref: 148841
West and Partners

Representation Summary: We note that it is imperative for the need for viability to be assessed in seeking contributions from developments towards transport infrastructure improvements so as not to undermine the delivery of development which will contribute to the regeneration of sites in the town centre.

Officer Response: Whilst this concern is recognised, any new development will continue to be expected to mitigate its impact on the town's transport network.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: Links with surrounding areas - East Grinstead, Horsham etc must be included.

Park and Ride is a good idea

Also need to encourage cycling and other sustainable options - longer term a tram service to other parts of Gatwick Diamond?

Officer Response: Agree that a sub-regional approach should be taken to the Transport Strategy and that sustainable modes of transport should be encouraged.

Note support of Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

Mrs Marian Ashdown
Respondent Ref: 149542
Natural England

Representation Summary: Natural England fully supports plans to encourage sustainable transport and considers that is best achieved by a combination of plans that improve public transport and a move away from dependence on car travel.

Officer Response: Noted.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: Existing cars must be used, parked and garaged without clogging the neighbourhood roads. One or two Park & Ride schemes are required, one to the east of Crawley adjacent to and accessible from the M23, and another accessible from the A23, M23 and/or the A264 in the Pease Pottage area. In both cases, parking charge rates will need to be substantially lower than the rates in force in central Crawley.

Note support of Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: "Mixture of carrot and stick is supported; however whilst the 'sticks' are explained, the 'carrots' are not clear.

Uncertainty remains about the efficacy of a park and ride scheme and the need should be very carefully explored in addition to the consideration of the benefits versus the disbenefits and whether a more sustainable option exists.

There are no explicit references to any cycle network within the borough and the potential role of the bicycle seems a little understated."

Officer Respondent: Agree, that the Transport Strategy will need to be clearer about what 'carrots' can be used to encourage people to use sustainable modes of transport.

Note cautious approach advocated to Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. What major transport improvements are required to support the development of Crawley up to 2026?

A strategic approach is needed to transport, and a strategy should be developed as part of wider infrastructure delivery with West Sussex Country Council as well as Horsham District and Mid Sussex. A 'pooled contributions' system could be adopted that apportions contributions (with public sector top up funding) from new developments provided this meets the Circular tests and the contributions are proportional to mitigate the developments impact. Community Infrastructure Levy now seems more unlikely to happen, the Council should not rely on it's implementation.

This would significantly reduce the uncertainty for major developers and assist with demonstrating transport impact mitigation. The 'manage and invest' approach and guidance in Circular 02/97 should be followed, with a presumption against new roads and for sustainable transport. Strategic transport priorities would then all be apportioned funding, whilst, the forward planning may facilitate Government and Regional funding allocations (through Major Scheme Business Case(s) or Regional Infrastructure Funding bids). A decision could also be made as to the actual need for a Western (Crawley) Relief Road, the possibility of which remains a constraint on further development (beyond the JAAP allocation) for land West of Crawley.

The South East Plan outlines the 'manage and invest' approach to transport. As such, the opportunity for Crawley to adopt schemes for Transport Innovation Funding (TIF) could also be considered, not least, for further enhancing walking, cycling and bus use.

Through the West of Bewbush JAAP, Crest Nicholson Developments are striving to implement, with Network Rail, a new station to serve the community. The opportunities for wider rail expansion should be considered, particularly along the Brighton to Victoria mainline, which is at/ or near capacity. The Crawley specific response may be to allocate land in the Three Bridges / Gatwick area. Furthermore, land could be allocated for the expansion/ improvement of Crawley Station as part of town centre regeneration.

2. Should the Council be more actively encouraging environmentally friendly modes of transport, and should the Council discourage less environmentally friendly modes of transport. How should this be achieved?

Yes. The role of walking, cycling, and public transport as well as car clubs and good travel planning should form part of successful and sustainable transport solutions. Such is achieved more easily through major development. Through the proactive use of planning contributions all development should contribute in order to adequately reflect 'cumulative' impacts of growth. The level of car parking for residential development, in accordance with PPS3 paragraph 51, should be aligned with local levels

of car ownership. Restricting car parking does not necessarily mean reducing car use. Instead proactive public realm/ design approaches and demand management should be followed which seek to reduce the dominance of 'car clutter' in the street scene.

3. Does the Borough need a Park and Ride scheme or should it explore more sustainable options?

Park & Ride requires separate evidence/ feasibility studies which should be pursued if the Core Strategy were to outline policy initiatives. It should be demonstrated to be deliverable over the lifetime of the plan.

Officer Response: Since the end of the consultation on the Core Strategy Review, the Government has published draft Guidance and Regulations for the Community Infrastructure Levy (CIL) indicating that there is still an appetite to introduce it. The Council will monitor its progress, as it would, in effect, provide the pooled contributions system suggested by the respondent. However, the advice to not solely rely on its implementation is supported. Consequently, until a decision is made, the Council will still use the recently adopted Planning Obligations and S106 Agreements Supplementary Planning Document (SPD). This could be reviewed to incorporate the suggestions if it was considered expedient.

The requirement for a western relief road will be considered as part of the Transport Strategy, the Core Strategy Review and sub regional decisions regarding the distribution of development outlined in the South East Plan. The Strategy will also research possible sources of funding, such as the Transport Innovation Funding (TIF).

The Council takes every opportunity to support the improvement of the rail network in the borough, most recently in responding to Network Rail's Sussex Route Utilisation Strategy (RUS) Consultation. Furthermore, the Council has been working with the relevant land owners to try and secure improvements to Crawley Station and the surrounding area.

Note comments in relation to parking standards and park and ride. These will be considered further as the Core Strategy Review progresses.

Mr Richard J Evans
Respondent Ref: 150656
Surrey County Council

Representation Summary: Concern that the impacts within the Transport Paper are considered in relative isolation. Cross border transport impacts within the broader Gatwick area and significant development in and around Crawley will have a transportation impact upon Surrey (this should be part of (a) strategic environmental assessment for the review. There is no reference made to Surrey, even in the context of partner organisations. In our view, this matter should be corrected.

Concern over possible impact of the new development in Crawley on Surrey (2,500 homes at land west of Bewbush, 1900-2200 in NES and Town centre development) The SA/SEA Scoping Report (Topic F) acknowledges that: 'the growth of the town will increase pressure on transport infrastructure that is already approaching capacity'. Similarly these developments in and around Crawley are likely to increase pressure on transport infrastructure in Surrey.

The County Council have not been consulted about the possible impact in Surrey. During review of the Core Strategy, the County Council would wish to be consulted on evidence that set out what impact the new developments may have on the transport network/highway services in Surrey.

West of Bewbush - proposed development stretches from the A264 in the south across the railway to Kilnwood lane in the north. the proposals do not show if the development links to Kilnwood lane or bewbush or lfield but, in our view, there could be some rat running along Surrey roads in the Mole Valley area that would not be acceptable. Even without the rat running a development on this scale would have a large effect on the

existing road network. Other than Ifield Avenue, in our view, there are no obvious points where it can be connected to the rest of Crawley.

NES - Balcombe road runs through this development which is already a very busy road, the development will have an effect not only on Balcombe road but also on Antlands Lane. Would also impact roads in Tandridge and Reigate and Banstead. Such an impact would need to be assessed and mitigated.

It would also be important to not only see the effect on key junctions like Longbridge Roundabout, but that the Fastway Scheme and Development Tariff is complimentary to that in Surrey.

Officer Response: Agree that the Transport Strategy will need to consider the role of the borough's transport network in the wider sub-regional context and the Council would welcome the input of Surrey County Council.

The West of Bewbush Joint Area Action Plan has now been adopted with the independent inspector satisfied that the transport impacts of the development will be mitigated.

Mr Chris Boocock
Respondent Ref: 150763
Sustrans

Representation Summary: Support CTC's Response.

The CSR should have reference to having a non motorised user route linking to the Horsham and Downslink path and to providing a proper safe route for non motorised users (NMU) out of Crawley to the south via Pease Pottage. Would like to see reference to Tilgate Park being improved with a series of waymarked NMU trails and improved entry/exit points.

Consider there should be references to providing a second entrance to Three Bridges Station on the east side.

There should be a clear vision statement for Sustainable Transport. Need to set out specific details as to what sustainable transport facilities will be provided. Crawley has everything going for it in this respect with its existing neighbourhood layout, gentle topography and network of greenspaces. Based on the European experience, providing a strategic foundation and vision at this stage will reap significant benefits as the town develops in the future.

Officer Response: The Council will continue to work with Sustrans and the other cycle groups in the borough to improve the cycle network.

The Council has been trying to secure the redevelopment of Three Bridges Station and its surrounds for many years now. The Council seek the option of opening the eastern entrance during future discussions with the relevant land owners.

Agree with the comments regarding sustainable transport. The final Transport Strategy will need to be much clearer about what the Council's vision is with regards to improving the sustainable transport facilities in the town.

Mr John Phillips
Respondent Ref: 150839
Tandridge District Council

Representation Summary: It is considered that as part of enhancing public transport facilities, an extension of Fastway to East Grinstead should be investigated. Securing the extension of the Fastway system to Redhill was supported in principle, however, it is considered that the villages of Godstone, Bletchingley and Nutfield along the A25 in Tandridge District should be linked into Fastway at Redhill as a quality bus priority route corridor with appropriate measures being included such as public transport information boards, high quality bus stops with

shelters, seating and real time passenger information displays. Similarly Smallfield should be linked into Fastway at Horley.

Officer Response: The Council is supportive of the Fastway system being extended to East Grinstead but it is understood that there are difficulties in installing the necessary infrastructure along the Mid Sussex section of the route. Equally, the Council would support the other extensions to the Fastway network suggested in principle.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: Concerned about the lack of reference to saving transport policies in the outgoing Structure Plan 2001-2016. In particular, the future provision of a Crawley Western Relief Road for the town which could make things difficult when development West of Ifield starts coming forward.

There also seems to be little in relation to the sub-regional transport work being carried out by the Gatwick Diamond Connect Group.

Until CIL comes in, S106 contributions will be sought towards improvements to sustainable transport infrastructure not just the former. Also the issue about park and ride has been longstanding, so a definitive position on this would be welcome.

The County Council is currently working with CBC to help them deliver a transport strategy for the town. It is suggested that the key transport policies of the Structure Plan should at least be part of the Core Strategy Review.

Officer Response: Agree that the Transport Strategy will need to consider the role of the borough's transport network in the wider sub-regional context and the Council is grateful for WSCC's continuing involvement in helping to produce this. The Council will

also have to work closely with WSCC with regards to what transport policies will need to be included in the Core Strategy Review in the absence of a Structure Plan. The Council will also be engaging with WSCC in the formulation of the infrastructure and implementation plan. The need for a western relief road will need to be considered as part of the Transport Strategy.

Note comments relating to CIL and Park and Ride.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: Improve bus services, more direct routes.

No park and ride scheme.

Note objection to Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

Mr B Wharton
Respondent Ref: 152314

Representation Summary: This is one area Crawley has had some real success - take the Fastway bus system. Crawley already has parking problems due to the density of the population. High density flats will make this worse especially with many more people living in town. Crawley needs to have more frequent bus services to the parts of town not served by the fastway.

Officer Response: Agree that the Council and its partners have been successful in encouraging sustainable modes of transport, particularly when compared with other authorities in West Sussex.

It is acknowledged that there are parking problems in some parts of the borough and the Council is resolving some of them through an

ongoing programme of Environmental Improvement Schemes. Furthermore, the Council will also be working with WSCC over the coming months in reviewing the current parking standards.

The Council works closely with the main local bus provider – Metrobus – to improve the bus provision, however, new services must be financially viable.

Mr Tim Hoskinson
Respondent Ref: 150185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: There is significant scope to upgrade Gatwick rail station and further improvements to coach and bus facilities and services. Whilst developments can assist with the delivery of off site transport initiatives, it is also incumbent upon the development documents to support and promote improvements to Gatwick rail station and coach services. In addition the off site transport initiatives should encourage transport agencies such as the HA to address motorway congestion *(more detail in rep)*.

The SEP, policy T1, requires relevant regional strategies and local development documents and transport plans to ensure that their management policies and proposals promote transport improvements etc. *(more detail in rep)*

Sustainable development is fundamental to the planning process and sustainable transport is a key component in achieving sustainability. Encouraging environmentally friendly modes of transport is therefore highly important. One of the key considerations is to locate development, especially major strategic development where it can be readily served by sustainable modes of transport *(more detail in rep)*.

An independent Park and Ride is less appropriate than a fully integrated strategy of which a Park and Ride may form a part

Officer Response: The Council is fully supportive of improvements to rail and bus services accessing Gatwick Airport and will continue to work with the main landowners involved.

Agree with comments in relation to Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

Mr Derek Meakings
Respondent Ref: 151803
(For full comments see rep)

The Council should take total control of all roads and not be dictated to by WSCC traffic team who have constantly proved to be inadequate. To encourage cycling and walking throughout the Crawley the Council should introduce Home Zones in all neighbourhoods within the next three years.

Reduce speed limits along arterial roads to 30mph and within neighbourhoods to 20mph.

Three Bridges Station area should be redeveloped

Town Centre North should have a full independent traffic plan prior to scheme being developed.

If NES is developed it should be ensured that surrounding residential roads in Pound Hill etc should be protected from being made through routes (same for East of Crawley / Crabbett Park)

If all the development planned in and around Crawley takes place the Fastway bus service should be extended and a Park and Ride built at each new neighbourhood.

Access to / from Gatwick M23 junction should be improved

Officer Response: WSCC is the local Highways Authority with legal responsibility for the borough's highways.

Sections of the recent Pembroke Park development in Three Bridges incorporate 'Home Zone' features and the Council is broadly supportive of such measures in appropriate locations.

The Council has been trying to secure the redevelopment of Three Bridges Station and its surrounds for many years now. The Council seek the option of opening the eastern entrance during future discussions with the relevant land owners.

The Transport Strategy will need to consider the impact of major developments, such as Town Centre North and the North East Sector, on the borough's transport network.

Note comments with regards to Fastway and Park and Ride. The Council will be considering this further as the Core Strategy Review progresses.

**Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and
Welbeck Land Limited**

Representation Summary: The consortium considers that the Council should allow for an overarching policy that seeks to reduce car dependency by supporting sustainable modes of transport, including the extension of bus priority measures and bus routes. Therefore the Consortium agrees that the council should be more actively encouraging sustainable modes of transport, whilst discouraging policies that could encourage greater car use.

Notes the Councils reference to the Draft Crawley Transport Strategy Baseline Information Report (2008) as part of the evidence base. However the report makes reference to the opportunity to establish and safeguard a route for a possible western relief road for Crawley and other strategic road schemes. Since the cancellation of the West Sussex Structure Plan 2001-2016 and the West Sussex Local transport plan

2006-2016, there is no longer policy support for strategic road based schemes. The Consortium considers that any requirement for strategic road based schemes in the CSR would contradict the Councils potential direction of discouraging unsustainable modes of transport in favour of more sustainable transport policies and would be without strategic policy basis.

Officer Response: The Council acknowledges that there is no longer a Structure Plan policy requirement for a Western Relief Road. However, in line with the Inspector's Report on the West of Bewbush Joint Area Action Plan, the Council's position with regard to a Western Relief Road is set out in Policy WB 23 of the Joint Area Action Plan.

**Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport**

Representation Summary: We welcome the general approach taken for topic paper 8 as it is an approach which is shared by Gatwick Airport through our surface access strategy. Our commitment to both increasing the proportion of air passengers/staff using public transport and reducing the number of vehicular trips per passenger also supports the CSR's objective of reducing the need to travel and improving accessibility by sustainable travel modes. Our forthcoming surface access action plan will set out more specifically, the actions the airport is committed to in relatively reducing the vehicular trips to and from the airport.

It is important that the CSR supports the objectives of the Gatwick Diamond but also contributes to the achievement of Gatwick Airport's surface access objectives.

The very strategic nature of Gatwick Airport, as a major international gateway, requires local transport policies to facilitate its ease of access and development. The provision of high quality highway and public transport access is critical to the airport's success and the associated economic benefits it brings to Crawley's administrative area.

A transport vision for Crawley should set out a list of transport challenges that need to be addressed in order of priority and proposed solutions to meet these challenges. A transport vision should be considered both in the context of being a facilitator of development in Crawley as well as needing to respond to the effects of it. Particular attention should be given to the airport as part of this with transport solutions being considered in a national, rather than local, context.

It is clear that the proposed increase in households to 2026 outlined as part of the CSR requires significant improvements to the local transport infrastructure. Measures to reduce the need to travel and make greater use of public transport and cycling/walking should reduce the amount of new highway infrastructure required but extra resources are required to provide levels of service extensive enough to achieve strong modal shift. Gatwick Airport would welcome active involvement in identifying the priorities for transport infrastructure improvements in the future. We see some of the main challenges to be as follows (not exhaustive) and make reference to some of the activities we are doing to support these at Gatwick:

- Ensuring there is sufficient investment in the strategic highways network (Highway Agency) to meet Crawley's access requirements – we are seeking to agree a programme of highways improvements to support the airport operating at 40mppa
- Enhancing road and rail connectivity to and from Crawley to facilitate employment growth – we are lobbying for strategic investments in rail by working with Network Rail and making responses to long term strategies such as the Kent and Sussex Rail Utilisation Strategy (RUS) consultations
- Improved public transport to major employment areas including the airport – we provide a dedicated public transport levy (fund) to support

public transport services to and from the airport, a branded commuter product for staff travel and a published staff travel plan.

It is our view that there are a number of other key topic papers that do require cross references to transport policies in the CSR, including housing, employment and town centre growth.

We believe that the CSR should be further encouraging more sustainable modes of transport by providing attractive alternatives to the private car and where possible, encouraging car sharing.

We would like to be involved in the debate about the provision of future park and ride facilities and about where and how such sites could be provided. However, in general terms, we would consider that, should significant resources be needed to deliver such a facility, these would be better directed at enhancing the existing public transport offer in Crawley. For airport passengers and staff, our car parking strategy considers that future parking requirements should be provided within the airport site. We recommend that the CSR reflects such a policy.

It is our opinion that, in transport terms, it is important to understand clearly what are the major contributors of growth in the borough over the next 20 years and to plan/fund the solutions to this appropriately. Gatwick has the busiest airport rail station in the UK with over 12 million rail users in 2008 (Office of the Rail Regulator). We are continuing to work with Network Rail, the station owner, to ensure that appropriate investments are made for its enhancement. It is hoped that there will be some improvements to the station including major track and signalling upgrades and a new platform delivered by 2012. We also have a longer term vision to create a completely new station building linked to the airport's entrance including a public transport interchange. Such a scheme would contribute greatly to improving the accessibility and quality of airport access across the region. We would therefore welcome a delivery plan for transport for both local and strategic access to and within Crawley.

Existing local forms such as GATCOM, the Gatwick Diamond Connect Group and the

Gatwick Airport Area Transport Forum can provide valuable support for the preparation of a delivery plan and we would be keen to be participate in helping to shape this. The forthcoming M25 to Gatwick Airport study supported by the Gatwick Diamond Connect Group (on behalf of the Regional Transport Board) should also provide a strategic input into this.

Officer Response: Generally agree with comments, and note Gatwick's commitment to encouraging sustainable modes of transport and the support for an implementation plan. The Council will continue to work in partnership with Gatwick in delivering improvements to the transport infrastructure in the Borough.

Note comments in relation to Park and Ride.

TOPIC PAPER 9 – GATWICK

Ms Kirsten Riensema
Respondent Ref: 146977
CAA (Civil Aviation Authority)

Representation Summary: Response lists development aviation issues that may provide useful background material. (See *original rep*)

Officer Response: Noted.

Ms Samantha Brown
Respondent Ref: 147280
Crawley and Gatwick Chamber of Commerce

Representation Summary: Supports the concept of second runway at Gatwick Airport for potential additional capacity of airport and for prosperity of Crawley and Gatwick Diamond area. Further development at Gatwick is preferable over development at Stansted and Heathrow. Believe that provided proper safeguards are put in place increased noise from a second runway would not be a problem to those in Charlwood and further reorganisation of airspace to the western end of runway might mitigate noise issues for those living in parts of Langley Green

Officer Response: Position on second runway is noted.

Mr Graham Arr-Jones
Respondent Ref: 147983
East Sussex County Council

Representation Summary: General support for the 'Indication of the Potential Direction' of policy options on Gatwick Airport in Topic paper 9 as published, in particular the need to:-

- Support growth of the airport up to 40mppa;

- Plan for managing the growth of the airport beyond this level up to 45mppa within a two terminal, one - runway format;
- Continue to safeguard land for a second runway until the case for or against it becomes much clearer, including the economic and environmental conditions under which it might be provided;
- Support the operation of Gatwick as an international airport providing a wide selection of scheduled routes as a locational asset for businesses and residents in teh Sussex area; and
- Approach the development control of the airport with the twin aims of safeguarding and developing its unique airport role.

Officer Response: Position with regards Gatwick issues is noted.

Miss Katie Gosling
Respondent Ref: 148072
Environment Agency

Representation Summary: We strongly recommend that flood risk is considered within Topic Paper 9, as a large area of the airport is within Flood Zone 3 (high risk) and Flood Zone 2 (medium risk). The airport currently floods in places from surface water, and flooding has the potential to significantly disrupt airport activities.

Officer Response: Note need to take into account flood risk implications in considering development at Gatwick Airport.

Mr Peter Minshull
Respondent Ref: 148635
Highways Agency

Representation Summary: The HA has been working with BAA and the Council on the current application for the North Terminal Extension.

When considering the need for policies to increase throughput to 45 mppa and consider a potential second runway, the HA would recommend that these are formulated as early as possible and would suggest their inclusion in the Core Strategy Review. It is recognised that the second

runway is a long term plan and there are a number of uncertainties regarding ownership and operation of the airport, however, it is felt that setting out the policy direction earlier rather than later will provide greater clarity to any future operator.

With regard to parking policies, the HA does not have a strong preference for any of the options. Where additional parking is proposed this should be at the minimal level.

The HA would support a policy that continues to restrict the provision of office space at the airport to airport related activities due to the potential impact on the Strategic Road Network. It also allows for transport initiatives, such as travel plans, to be implemented more easily.

Officer Response: Position with regards to growth at the airport and restricting the use of office space at Gatwick is noted.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: It is unwise to rely on a single source of income for the town, as its collapse could have a disastrous impact on the town.

Officer Response: Position with regards to Gatwick is noted.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: Need to consider second runway as a serious option.

Officer Response: Position with regards to Gatwick is noted.

Miss Claire Tester
Respondent Ref: 149286
Mid Sussex District Council

Representation Summary: Airport parking - The paper refers to adjacent local authorities having policies which support CBC's policies relating to long term airport parking. On adoption of the Core Strategy for Mid Sussex, it is likely that there will no longer be such a policy within the Mid Sussex LDF. Other sources of policy will be used including Core Policy on transport which has objective of reducing need to travel and promoting sustainable transport, Core policy relating to development in the countryside and SE plan police T9 - priority to Airport Surface Access Strategies - increasing modal shift in favour of public transport and sustainable modes.

Officer Response: Lack of policy in Mid Sussex LDF on airport car parking is noted.

Mr Chris Wojtulewski
Respondent Ref: 149716
Parker Dann

Representation Summary: Response made on behalf of Gatwick Parking Association CSR should seek to support the principles for sustainable growth at Gatwick Airport. Gatwick is under pressure to meet existing demands which is some 5mppa below the predicted growth figure over the next few years.

The CSR must include clear policy concerning Airport related parking both within the airport boundary and off-airport to cater for projected passenger growth. CSR should allow for growth in airport related parking provision, but also allow for off airport parking proposals to be considered on their merits and where such provision can be met in a sustainable

manner i.e. where a site is linked to an existing off airport site or would be located on adjoining or neighbouring land and where park and ride facilities are currently in operation.

A policy approach that expects the entire cumulative effect of airport growth including long term parking to be accommodated within the airport boundary is insufficiently flexible to address future needs and would therefore fail the 'Effective' test of soundness to be applied to the CS docs as identified in the govt's PPS12.

Concerned that a single development management policy concerned with parking within the airport boundary will not offer a sufficiently flexible approach to the issue, or allow consumer choice. No reference is made to policy concerning off-airport parking provision despite the fact that this is currently addressed in the existing adopted Local Plan. Applications for additional airport parking should be assessed strictly on their merits whether the proposal is on airport or off airport.

As well as an on airport parking policy, the Council must also include a policy concerning off-airport car parking to replace the existing saved policy GAT8 of the adopted local plan. The Council should resist any suggestion of introducing one overarching policy in the CSR.

Saved Policies GAT5-10 may have a common thread between them but they deal with distinctly different issues, all of which are fundamental importance to both the existing and future development proposals at Gatwick Airport. It is the GPA's opinion that the policies should be retained as currently worded with their existing criteria for assessing applications remaining unaltered, save for policy GAT8 which should remain as currently worded but include the following additional words:

"Favourable consideration will be given to existing sites that can accommodate additional capacity on existing sites or on adjoining, or neighbouring land and where existing park and ride facilities are utilised by travellers as a means of accessing the airport's terminals"

Officer Response: Comments on need to allow for growth of off-airport long term car parking are noted and will be considered at the Preferred Strategy stage.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: The airport is a national feature and asset, and what Crawley may want from the airport is nothing compared with what Central Government, national industry, and the national population want. It has always been part of the Crawley scene, generating employment, and noise.

Officer Response: Position with regards to Gatwick is noted.

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. How should the Core Strategy Review address growth of the airport to between 40 and 45 million passengers per annum as a single-runway two-terminal airport?

Gatwick Airport is clearly one of the main economic drivers in the area. The growth and opportunity in the Gatwick sub-region is fuelled by the Airport. This includes the renaissance of the Town Centre, wider town regeneration and the development of sustainable urban extensions. The connections from the Airport to the strategic road/ rail networks are also important given the associated business/ economic sub region, whilst the opportunity to associate Airport expansion with enhanced rail linkages (Thameslink and High Speed Rail connections) should be pursued longer term.

2. Beyond the requirement to safeguard land, how should the Core Strategy Review deal with the possibility of a second runway given the potential impacts towards the end of the plan period?

The possibility of Airport expansion is beyond the remit of the LDF being an issue for the Infrastructure Planning Commission (IPC) and National Planning Statements (NPS). However, the Council through LDF production and the associated SA/SEA has the opportunity to formulate a view on airport expansion in terms of localised planning / environmental impacts. This evidence could be used to determine not only a Council position on the expansion, but also the type of associated development close to the Airport, not least the role of the North East Sector.

It may be that should the expansion be implemented, alternative areas in/ around Crawley, such as West of Crawley, be considered for additional growth. The Core Strategy needs to adopt a 'with or without' scenario to the issue, and recognise the role of the IPC and NPS.

3. Should the Council continue to restrict the use of office space at the airport to airport related uses?

Expansion of offices at accessible locations should be encouraged as this facilitates employment and in turn facilitates sustainable communities in the wider area. This does not necessarily mean that all offices should be town centre. Gatwick, through its excellent rail/ bus links, is a very accessible location.

Officer Response: Position with regards to growth of the airport and how this relates to the IPC and NPS is noted and will be addressed at the Preferred Strategy stage.

Ms Samantha Coates
Respondent Ref: 150243
SEEDA (South East England Development Agency)

Representation Summary: SEEDA consider that the Core Strategy should continue to safeguard land for a second runway at Gatwick Airport

Officer Response: Position on second runway is noted.

Mr Richard J. Evans
Respondent Ref: 150656
Surrey County Council

Representation Summary: We continue to support continued commitment to joint working over Gatwick issues.

Officer Response: Support is noted.

Mr John Phillips
Respondent Ref: 150839
Tandridge District Council

Representation Summary:

Surface Access

There is no indication that Crawley Borough Council supports the principle of the redevelopment of Gatwick Station. The redevelopment of Gatwick Station is a much needed and significant major project of local and regional importance and should have the earliest possible completion. It is considered important, therefore, that the Borough Council should positively indicate its explicit support for this project.

Airport Expansion to 45 Million Passengers per Annum

If Gatwick Airport is to expand to 45 million passengers per annum, robust environmental safeguards will be needed. As far as the Council is aware, it has not been demonstrated that the proposed expansion is compatible with the transport infrastructure and environmental character in the area, having regard to the likely level of traffic generation from the Airport and the adequate availability of alternative transport modes.

Second Runway

The Council is opposed, in principle, to a second runway at Gatwick Airport and considers that no action is required to deal with the possibility of a second runway beyond the requirement to safeguard land.

A second runway would mean that those communities who suffer noise at present will get increased noise. In addition, noise impacts would increase significantly, particularly affecting the communities of Domewood, Dormansland and Felcourt. This would be unacceptable, and exemplifies the insuperable difficulties of further expansion of the Airport.

Officer Response: Position on growth of Gatwick and second runway is noted. The Borough Council's support for redevelopment at Gatwick Station is contained in a Supplementary Planning Document.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: Some quite specific comments are made about the terminology used in the Topic Paper. There should also be a more detailed reference to the National Policy context.

Consider that the topic paper should clarify the role of CBC should a second runway at Gatwick be brought forward given the provisions of the Planning Bill 2008 and the role of the IPC.

Officer Response: Comments regarding terminology and national policy are noted. Role of CBC to reflect the Planning Bill and IPC will be addressed at the Preferred Strategy stage.

Mr Tony Leppard
Respondent Ref: 151613
FMX Ltd

Representation Summary: We are keen to expand our business, and have recently acquired 3.5 acres of land to the north and west of our current premises at Westfield House, Bonnetts Lane. The land is accessed from Charlwood Lane. We are keen to open discussions with regards expanding our facilities to incorporate a six building campus across the whole site (including Westfield House) to accommodate future research and development inclusive of accommodation for overseas trainees and support staff.

Officer Response: At this stage, it is considered, that the site will remain designated as countryside as well as being in the area safeguard for a possible second runway at Gatwick.

Mr Hubbard
Respondent Ref: 151662

Representation Summary: Nitrogen dioxide pollution in Ifield should be monitored - it has exceeded 50 micrograms per cubic metre three times in 2002

Officer Response: NO₂ monitored in Ifield 2002 and was well below required levels.

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Crawley needs Gatwick. It is probably the major reason why Crawley has grown relentlessly for decades. I see the case for another runway, but I'm terrified of the growth it would cause - Crawley is in real danger of joining to Horley and Horsham. I think a runway say at Stanstead where the local area is not over developed is better.

I admire the councils stance of trying to maximise Gatwick as it is - on this issue they realise you cannot have continuous growth is impossible.

Officer Response: Position on second runway is noted.

Mr Tim Hoskinson**Respondent Ref: 150185****Savills (on behalf of the Gatwick Green Consortium)***(For full comments see rep)*

Representation Summary: The Council should safeguard adequate land within the airport boundary for operational purposes. Gatwick Green proposal can operate successfully in either a one runway or two runway scenario Phase 1 of Gatwick Green remains clear of all future access requirements for a future runway. Later phases will be considered concurrently with any future runways and access proposals.

Office floorspace within the airport boundary should be restricted to that associated with the operation of the airport, in order to protect the airports expansion capability.

Officer Response: Comments on relationship between Gatwick Green proposals and potential future runway requirements are noted.

Mrs Julia Dawe**Respondent Ref: 150037****Reigate and Banstead Borough Council**

Representation Summary: Wording in blue refers to the "opportunity to shape the way the town development..." With regard to Gatwick Airport although it is within the CBC boundary most people would not regard it to be in the town. Future consultations should make this clear.

Support CBC's continued support of the growth of Gatwick up to 40mppa as a two terminal, one runway airport.

The timeframe of the CSR and the publication of the SEP results in the topic paper to recognise the need to safeguard land for a possible second runway and address the possibility that a second runway could be developed in the latter part of this plan. RBBC believes this is the correct approach, however due to the uncertainty about the need or impact of a second runway, detailed plans or policies for the development of a second runway at the airport would not be needed in a revised CS.

Officer Response: Position on growth of Gatwick airport is noted.

Mr Derek Meakings**Respondent Ref: 151803**

Representation Summary: If the North East Sector is developed then the potential major road problems created by the currently proposed changes to the Balcombe Road will create a further potentially disastrous problems (will definitely cause problems for access from the south to East Surrey Hospital) whenever the M23 and/or M25 east of the M23, become blocked and traffic uses the A25/A22 and other country roads to access Gatwick. Access to the Gatwick M23 junction from the east must be developed.

To provide access to Gatwick from the west the proposed West of Ifield development must include a west/northern by pass.

Officer Response: If the NES is developed, there will need to be improvements carried out by the developer to mitigate any effect of the development as identified by transport assessments. The need for a new access to Junction 9 at Gatwick from the east has not been identified. The West of Bewbush Area Action Plan safeguards and doesn't prejudice the delivery of a relief road, if required to support further development at Crawley.

Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport

Representation Summary: The requirement to safeguard land for a possible second wide-spaced runway at Gatwick is still a key planning policy at a national, regional and local level. It is vital that the CSR maintains a policy for safeguarding land for a possible new runway at Gatwick. The CSR adopts the principles in national aviation policy and continues to ensure that a policy is developed to safeguard for the possibility of an additional runway at Gatwick until such a time that the Government provides a firm decision on runway capacity in the south east.

The CSR will be near adoption when the NPS on aviation is published. Therefore to provide sufficient robustness the CSR should continue to safeguard for the option of an additional runway at Gatwick. The CSR should include a set of policies that would address the development of a second runway in the latter part of the plan period. If this is not possible then the CSR identifies a mechanism to facilitate a policy review in the event of second runway development being brought forward. We suggest that this would also be supported by comprehensive supplementary planning guidance.

Current planned investments at Gatwick will improve passenger journeys and increase capacity. It is therefore considered appropriate for the CSR to establish a policy basis for potential future growth to 45 mppa within the lifetime of the plan.

The CSR may need to take into account any changes resulting from the change in ownership of Gatwick Airport and the economic regulation of airports.

There should be a permanent relaxation on the use of office space for non-airport related uses. This is an important step towards improving the diversity and vitality of the airport business setting. The expansion of the airport to meet a wider business sector will compliment business activities in Crawley and facilitate in attracting new businesses to the region.

We will continue to work with CBC to explore opportunities in relation to car parking policies.

Officer Response: The comments of Gatwick Airport Limited on the growth of the airport and the need to safeguard land for a second runway are noted. These comments and those on the use of office space and car parking policies will be taken into account at the Preferred Strategy stage.

TOPIC PAPER 10 – COUNTRYSIDE

Mrs Pippa Aitken

Respondent Ref : 147710

CB Richard Ellis (on behalf of the Homes and Communities Agency)

Representation Summary: The HCA suggests that, having regard to adopted South East Plan policies and PPS12 infrastructure planning requirements, this topic should be encapsulated within a wider consideration of Green Infrastructure.

Now that the South East Plan no longer includes reference to Strategic Gaps, the Council will need to consider, within the overall issue of Green Infrastructure, an appropriate policy response to the future of land which is currently designated at local level as Strategic Gap."

Officer Response: Noted – The preferred strategy consultation will reflect requirements of the adopted South East Plan and PPS12 infrastructure requirements.

Policy response to deletion of strategic gaps will be part of a criteria based policy informed by an appropriate evidence base as advised by govt in PPS7 para 24 -25.

Miss Katie Gosling

Respondent Ref: 148072

Environment Agency

Representation Summary: In a predominantly urban borough it is vitally important that urban biodiversity is recognised and encouraged. We suggest that this section is modified into a wider biodiversity theme which reflects the urban nature of the borough and recognises urban green spaces and encourages wildlife. PPS9 should be included in Topic Paper 10 under 'current context'.

Officer Response: Agree that biodiversity is recognised and encouraged. This will be reflected in the preferred strategy stage.

Mrs Jenny Frost

Respondent Ref: 148833

Ifield Village Conservation Area Advisory Committee

Representation Summary: IVCAAC supports the recognition that the limited countryside within the borough is a valuable asset, and that the interface between town and country is important. Transitions between town and countryside need to be 'well-integrated' so that high-rise, high-density housing is not placed next to a rural area. Footpaths, bridleways, and possibly information centres should be encouraged. Issues of countryside access, protection and education are all important.

Most of the countryside giving Ifield Village Conservation Area its rural character is beyond the borough boundary; a cross-authority policy to protect the neighbouring countryside should be considered. The strip of countryside within the borough boundary should also be protected. We feel that the area needs more value placed upon it, and Ifield Village Conservation Area may itself require a specific policy due to its intrinsic value. Any development west of Crawley would be detrimental to the setting of the town as a whole and the conservation area in particular.

Officer Response: Agree that access to the countryside should be promoted through links to the green network and corridors and that the transition between urban area and countryside does not impair public enjoyment and access to the countryside.

Joint working between CBC and adjacent authorities is vital in delivering a sound plan which addresses issues that do not respect authority boundaries.

Mr Peter Brooks

**Respondent Ref: 148858
Telcon Ltd**

Representation Summary: Need to encourage use of countryside as parks or leisure type use.

Officer Response: Noted – this accords with para 26 of PPS7 which encourages improvement of public access to the countryside around urban areas through support for Country Parks, Community Forests and facilitating the provision of appropriate sport and recreation facilities.

**Mrs Marian Ashdown
Respondent Ref: 149542
Natural England**

Representation Summary: Natural England support the intention to undertake a landscape character assessment and recommends that this is tied in with an assessment of the current green infrastructure in the built up area of the borough. This could potentially help determine which are of low quality and are not contributing to viable green infrastructure if it is likely that some open spaces are considered for development in the future. It would also be able to identify where some areas of connectivity/green infrastructure through the BUAB needs to be improved.

Networks of interlinking habitats are important for dispersal of species and genetic exchange in both urban and rural areas. These habitats include ancient woodland, LNRs and SNCIs. Such areas are vulnerable to loss through development.

CBC should also recognise that Local Biodiversity Action Plans (BAPs) which are applicable in the Crawley area. These include Urban BAPs and Woodland BAPs. Crawley also includes heathland - a national BAP priority - and hedgerows. By recognising the wealth of wildlife in the district and ensuring that these areas are protected and enhanced, the council can make a valuable contribution to National BAP targets.

Officer Response: Agree that any assessment of the landscape outside the built up area should tie in with the green infrastructure within the Built up Area Boundary. The benefits of this approach are also noted.

**Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association**

Representation Summary: We must accept that no significant area of countryside 'belongs' to Crawley, as most of the town's countryside falls within Horsham, and Mid Sussex. Crawley should have its own area of countryside for its local population to enjoy, and where unavoidable, local government may wish to consider the planning of a new neighbourhood/s. Crawley should 'own' a swathe of countryside around the town for the enjoyment of residents (including possible leisure facilities), not for future development.

Officer Response: Much of Crawley's countryside setting is located outside the Borough Boundary. In accordance with national and regional policy, the Council will work with adjacent authorities to ensure that decisions are based on sustainable development principles, the quality and character of the wider countryside is protected and, where possible enhanced and that recreation and enjoyment of the countryside is promoted.

**Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council**

Representation Summary: Support the proposed policy approach and BUAB principles, having full regard to a landscape character assessment.

Officer Response: Noted

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: The Built Up Area Boundary (BUAB) will over the course of the plan likely be reviewed dependent on if/when the West of Bewbush development forms part of Crawley Borough. The present boundary to the west of Bewbush, east of the JAAP allocation, is effectively redundant given the development allocation. Instead, the opportunity exists to highlight through design guides, the rural / urban fringe policies and principles of the South East Plan (policy C5 refers) including countryside access and rights of way (policy C6). The Core Strategy need not repeat these.

The town is constrained by the Airport to the north and High Weald AONB to the south. As such options east may also be considered. Crossing the M23 need not be a constraint.

Officer Response: Noted

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: Suggests that local information can make national policy relevant and it is important that up to date ecological data forms part of the evidence base when looking at future land use and management.. Need to ensure that development is only permitted within the environmental capacity of an area and that an ecosystem approach is adopted to ensure a robust landscape capable of adapting to the effects of climate change.

A rich mosaic of well connected habitats across a landscape is needed for wildlife rich, healthy environment. It is also important that there is permeability between the urban and rural areas of the borough so that access for people and wildlife movement are realised. policy cards on Agriculture and Woodland and Forestry Policies for a Living Landscape are enclosed.

Officer Response: Noted – The council will have regard to biodiversity in formulating the preferred strategy.

Mr John Phillips
Respondent Ref: 150839
Tandridge District Council

Representation Summary: Strict policies of restraint should operate in the areas that will no longer be covered by the strategic gap designation to prevent the coalescence of the urban areas and to prevent the loss of the separate identity of settlements.

Officer Response: The separate identity of settlements will be maintained through criteria based policy justified by evidence.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: Support the approach to re-establish a boundary in the absence of the Strategic Gap.

The County Council would be happy to assist with a Landscape Characterisation Analysis project if required. In addition, it may be useful to refer to WSCC Landscape Character Analysis and the associated Land Management Guidelines for those areas within CBC.

It may be worth bringing more emphasis to Landscape Character within the criteria suggested for the BUA. Suitable wording suggested.

Officer Response: Noted

Mr Keith Wall
Respondent Ref: 151563
Worth Parish Council

Representation Summary: Bearing in mind the rural nature of the Parish it is essential to retain a separation (formerly a "strategic gap") between the Parish and its Urban neighbours both to the west and to the east.

Officer Response: The separate identity of settlements will be maintained through criteria based policy justified by evidence.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: CBC should work with Sussex Wildlife trust.

Officer Response: Noted

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Unfortunately, Crawley's record in protecting the countryside has not been good. It has let people move in and simply built up to its boundaries, including former Horsham and Worth land.

As there are open spaces and green corridors within the town people should be encouraged to use them. Effectively, these green avenues are

our countryside. Leave the open spaces and corridors within and people will use them. Destroy them, as has been occurring, and you will force more people out into the open countryside.

Officer Response: Agree that use of green corridors and open space should be encouraged

Mr Tony Fullwood (on behalf of Mrs Williams and Mr M Robinson)
Respondent Refs: 149746 and 146753

Representation Summary: Object to the Topic Paper identifying the limited amount of countryside within the Borough as a Key Issue. Access to the countryside around Crawley (rather than the amount within the administrative boundary) should be identified as the Key Issue for the town as the borough boundary is unlikely to be perceived as a barrier to accessing the countryside. The location of the administrative boundary is already cited as irrelevant in relation to housing provision (potentially outside the Borough boundary) and it is therefore illogical to identify countryside within the borough boundary as a Key Issue. Cross-boundary talks, advocated in relation to potential housing sites, are equally valid in relation to access to the countryside and such a proposal should have been included in the Topic Paper and should be implemented in any future stages of plan development.

The Topic Paper refers to a recent review of the Built Up Area Boundary – although this has not been made available as part of this consultation. I would request consultation on this document. Detailed comments are provided on the BUAB Review.

The BUAB has been reviewed against the guiding principles. However, it is not complete as the review is an ongoing process. It was originally intended that the assessment so far would be part of the non statutory consultation. However it was felt that it would be appropriate to consult widely on the principles as they are a key tool in assessing whether areas relate more to the urban area than the countryside. The responses that we receive as part of the consultation will be taken into consideration and

the review updated accordingly. The review also needs to take into account other assessments such as the Characterisation Assessment as well as proposed strategic development opportunity sites that are identified through the Core Strategy review and are located outside or extend beyond the Built-up Area Boundary.
Gatwick Green

Some areas of countryside in the vicinity of Gatwick Airport and M23 do not offer high quality countryside as those areas further away from these areas. As a result some areas of land to the east of Gatwick do offer opportunities for accommodating necessary forms of development to be implemented without affecting more valuable countryside.

The Strategy Gap should be removed from the Core Strategy Review for reasons stated by the Inspector at the last Core Strategy examination and in accordance with government advice which advises the deletion of strategic gaps from planning policy.
(Further detail in rep)

Officer Response: Comment regarding countryside as a cross boundary key issue is noted.

National and regional policy now discourages local landscape designations and advocates the use of criteria based policies to protect and enhance the diversity and distinctiveness of the local landscape. The preferred strategy will need to take this guidance into account.

Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and
Welbeck Land Limited

Representation Summary: Agrees broadly with BUAB principles, specifically with the principle of including existing development commitments and new development adjacent to the Borough's boundary.

Concurs with the Councils intention of producing a landscape Character Assessment and that any development should have regard to the study.

Officer Response: Noted

TOPIC PAPER 11 – OPEN SPACE

Mrs Tricia Butcher
Respondent Ref: 146852
British Horse Society

Representation Summary: The current policy approach of protecting sites unless proven to be surplus is still relevant. In fact, even more so today with growing pressure for development. The Council should consider a limited release of some of the lower quality and poorly used sites to help meet the need for development land. This should only happen, however, after thorough investigation and consultation with the local community.

Informal recreation facilities, especially multi-use public right-of-way (PROW) and greenways are considered to be particularly important and should be protected. Keen to see access to the PROW network and the wider countryside, protected and improved. Over the years the network has become fragmented by development and increased volumes of traffic on roads. This needs to be addressed, so that all users - walkers, cyclists and horse riders - can safely enjoy these paths. It is important that paths link safely both around and through the town and to the countryside beyond.

Other documents relevant to the Core Strategy Review are the West Sussex Rights of Way Improvement Plan, Strategic Framework 2007 - 2017 and Natural England's Access Policy 3.

Officer Response: The suggestions are noted and opportunities for new PROW can be explored as part of the update to the PPG17 assessment.

Mrs Pippa Aitken
Respondent Ref: 147710
CB Richard Ellis (The Homes and Communities Agency)

Representation Summary: As suggested in relation to the Countryside Topic Paper, these subjects may also be best considered as part of overall Green Infrastructure requirements in the Borough.

The HCA endorses the proposed approach of reviewing all existing open space provision, and giving consideration to opportunities for releasing some sites to meet development needs in the Borough. It accepts that this will require an update of the current PPG17 study to provide appropriate standards of provision in the future, and considers that qualitative aspects should be taken into account in considering future requirements. In this context, the HCA supports the Council's identification of land at Tinsley Lane as a potential housing site along with reprovision of appropriate sporting facilities, but it also considers that any requirement for reprovision must take account of revised standards resulting from the updated PPG17 study.

Officer Response: Noted.

Miss Katie Gosling
Respondent Ref: 148072

Environment Agency

Representation Summary: Biodiversity has not been adequately addressed through the Core Strategy Review; there is no mention of how wildlife sites will be protected from development, or of National Indicator 197. The importance of waterways as wildlife corridors should be recognised. Reference should also be made to green infrastructure.

Officer Response: Agree – The issues of biodiversity and whether locally specific policy is relevant will be taken forward within the Review process. Green infrastructure will be addressed within the infrastructure plan that will support the Core Strategy.

Mrs Jenny Frost

Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: Trees and open spaces running through the town are fundamental to the town design and need protection, and IVCAAC would support the current policy approach as much as possible. We are not sure how 'until found surplus' is to be judged, and land not visited frequently is not necessarily surplus. Likewise, the definition of 'poorly used sites' is unclear. Any assessment of open space should be compiled over time (not just a 'snapshot') and should go beyond just counting the amount of people who go there. Special protection should be given to Ifield village green, as it the only registered village green in the town, whilst allotments are also an important resource to be protected.

Officer Response: The support for the current policy approach is noted. The issue of assessing whether a site is surplus or of low quality is a subjective process and each site will need to be considered individually, in consultation with the local community and with an understanding of the local levels of provision. For example, if there were two similar sites in close proximity to each other, possibly of relatively low quality, then the loss of one site might be able to fund improvements to the other, potentially resulting in one valued and high quality space. The issue of the snapshot approach should be addressed with each subsequent update to the PPG17 assessment, and to support the Submission Core Strategy the PPG17 will be updated. The special status of Ifield Village Green and allotments can be explored within the update to the PPG17 assessment.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: Some of these areas are vulnerable to development pressure; they should not be. Many Crawley residents seem to view an area of open grass as a waste of space, and would prefer

development in the form of sports facilities, a café etc. These areas could be used for residents' enjoyment, and with support, a little money, and help from dedicated local residents, the 'wilder' side of Crawley's 'unbuilt environment' can be improved.

Officer Response: Noted, whilst the Core Strategy might not be able to deal with the issue of enhancing the wildlife value of existing sites, this suggestion will be passed onto the Council's Amenity Services team for consideration.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: Supports current approach of protecting sites unless proven to be surplus. The release of these sites should only be considered where there is an oversupply in a particular area. Poorly used and lower quality sites should only be released if there is an oversupply. Open space, whatever the quality or levels of usage, can provide an important link between habitats and can mitigate climate change impacts such as flooding and facilitate urban cooling.

Officer Response: Noted

Mr Charles Collins
Respondent Ref: 150201
Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. Is the current policy approach of protecting sites unless proven to be surplus still relevant?

Yes this is relevant. The Council should assess their open space through PPS17 and place a balanced weight on both the qualitative and quantitative measures of open space. If an area of open space is not of sufficient quality or surplus it should not just be retained due to its historic designation. In addition, new developments should not be forced to

deliver even more open space if it will place more pressures on nearby existing open space. New development with good linkages to existing open space could enhance this as a qualitative measure rather than just increasing the quantity.

The value of good urban design and architecture should be noted. Crawley as a new town is characterised by a post modern vernacular, with associated impacts on economic value. Through a long term strategy of change the perception and value of Crawley can be enhanced.

2. Should the Council consider a limited release of some of the lower quality and poorly used sites to help meet the need for development land?

Yes, should evidence demonstrate. A pragmatic approach to large areas of public open space should be taken, in that it is likely that such does not contribute towards the quality of place in a number of locations. See question 1 above.

3. Are there any particular areas/types of open space/recreation facilities that are of particular importance to you?

The existing Leisure facilities at Bewbush should be safeguarded in some form, including some, perhaps not all, sports facilities located within the Bewbush area. This will assist with the integration with the proposed development West of Bewbush.

Officer Response: Agree with response to first question. The issue of balancing quality and quantity requires additional work to ensure the baseline established within the Core Strategy Review is accurate and does not lead to purely a quantitative approach. Rather, purposeful sites that contribute to the wellbeing and character of the town will be sought.

Note other comments.

Miss Vicky Aston
Respondent Ref: 150433

Sport England

Representation Summary: Sport England considers that the Council's current policy approach to protecting sites unless proven to be surplus is still relevant. The Sport England policy approach is to prevent the loss of facilities or access to natural resources that are important to sports development, and where redevelopment is unavoidable, equivalent or better facilities should be provided in a sustainable location.

It is important that local authorities are pro-active in resisting the development of open space, playing fields and built facilities in their ownership, and any proposed reduction in provision will need to be fully justified and based on a robust evidence base. Regard should be given to the policy presumption (PPG17 para 15, and Sport England) against development leading to the loss of, or prejudice the use of, any part of a playing field, or land last used as a playing field.

Officer Response: Noted, although in the case of Crawley, due to high levels of provision there exists some potential for qualitative improvements to some sites where usage and value are low. These opportunities will be explored as part of the review to ensure that both the development aspirations of the town and the quality required for open space, sport and recreation are met.

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: Open spaces, recreation, leisure and greenways can increase in functionality if planned within a well connected green network across the urban area and linking to the surrounding countryside. We would like to see sustainable transport routes and designated nature sites included in this network.

This approach is supported by the South East Green Infrastructure Framework; from policy into practice and Policy CC8 of the South East Plan. Enclosed policy card Site protection Policy for a Living Landscape

discusses the need for 'ecological coherence' between sites to improve biodiversity.

Officer Response: The Council intends to prepare an infrastructure plan to maximise the development of greenways etc within the town over the life of the plan.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: At this stage WSCC would support Option 2 and suggest that this is carried out on the basis of a Green Infrastructure approach to Open Space, Sport and Recreation. There is a concern that if a Green Infrastructure approach is not used then opportunities could be lost in the future owing to a lack of information / evidence base.

The existing PPG17 Assessment appears very thorough and this could be used as a basis for a re-evaluation of Open Space against the Green Infrastructure criteria. It is important that open space is multi functional and evaluated against multi functional criteria - the PPG17 Assessment does not cover this as it was not a PPG17 requirement.

The broad subject areas for investigation would be opportunities for alternative transport and linkages, climate change adaptation, enhanced biodiversity and linkages to ecological network, historic/cultural issues, all on existing open space assets This should be together with broad analysis of potential future opportunities and aspirations for Green Infrastructure which could be achieved/funded through the release of 'underperforming' open space (once assessed as above!), pooled 106 funding or any other appropriate source.

Officer Response: Noted and these issues will be scoped out through the infrastructure plan to be developed in support of the Core Strategy submission document.

Mrs J Raish
Respondent Ref: 152264

Representation Summary: There should be more green areas and play areas.

Officer Response: There are limited opportunities for new forms of provision, however, there may be opportunities to enhance the quality of the green areas and play spaces to make them more appealing. Where possible opportunities for this will be considered.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: Work with Sussex Wildlife Trust and other countryside agents. Improve and create wildlife corridors around the borough.

The topic mentions 'underused' open space, but often many people walk past and enjoy the visual pleasure of open space. All the open spaces are important. They also contribute to the well being of all Crawley residents. The land under the road from Grattons park has a wonderful set of bluebells and other wildflowers which suggests that it is ancient woodland.

The loss of paddling pools is a great source of sadness - could some be provided?

Officer Response: The value of structural landscaping and amenity land within the town will be considered within the Core Strategy Review with the intention of creating locally specific policy where possible.

The loss of the paddling pools is not an issue for the Core Strategy, but the suggestion will be passed onto the relevant Council department.

Mr B Wharton

Respondent Ref: 152314

Representation Summary: This is one area that does not need any development. This needs protection. The principles of New Town/garden cities are just as vital now as ever. Crawley's green spaces have been declining every year. We have to try and control the area's development not let it increase rapidly.

Officer Response: Work as part of the Core Strategy will seek to identify and protect areas of the built environment that have a value in terms of structural landscaping and amenity and play value. It is the intention to strengthen the policy where possible.

Mr Tim Hoskinson

Respondent Ref: 150185

Savills (on behalf of the Gatwick Green Consortium)

(For full comments see rep)

Representation Summary: No comment on protecting open space or release of sites to meet the need for development land

Gatwick Greens proposed site offers opportunities for accommodating strategic development along with environmental improvements etc and other infrastructure.

(more detail in rep)

Officer Response: Noted

Mr Tony Fullwood

Respondent Ref: 146753

On behalf of Mrs Williams

Representation Summary: Support the option which undertakes a strategic review of open space with a review to releasing some underused sites, or where there is already sufficient provision. Objections are made elsewhere to the factual accuracy of the Open Space, Sport and Recreation Study which will require correction.

Nevertheless, the Study correctly identifies two of the main issues for open space provision in Crawley which have arisen through the strategic review as:

- new development which positively shapes open spaces, public parks, and sports or other recreational facilities is encouraged
- development which has the potential to enhance the surrounding area, as well as improving community access to open green space or to providing additional recreational facilities is welcomed

I have consistently argued for the release of a site in Worth, off Saxon Way with a view to new development which positively shapes this open space and enhances the surrounding area, as well as improving community access to open green spaces.

OPEN SPACE, SPORT AND RECREATION STUDY

This evidence base is not robust and credible in its current format and requires amendment as set out below.

PARKS AND GARDENS

The Open Space, Sport and Recreation Study incorrectly identifies sites in Worth as Parks and Gardens.

The PPG17 definition of Parks and Gardens:
including urban parks, country parks and formal gardens

The land identified clearly does not meet this definition. This definition should be removed from these sites and the evidence base corrected to accord with its purpose set out in Paragraph 1.13 to illustrate a comprehensive and accurate picture of current provision in Crawley.

NATURAL AND SEMI-NATURAL

Worth Way, which comprises a road with some inconsistent boundaries appears to be classified as Natural and Semi-Natural Open Space.

PPG17 definition of Natural and Semi-Natural Open Space: including woodlands, urban forestry, scrubland, grasslands (eg downlands, commons and meadows) wetlands, open and running water, wastelands and derelict open land and rock areas (eg cliffs, quarries and pits)

The land identified does not meet this definition. This definition should be removed from Worth Way and the evidence base corrected to accord with its purpose set out in Paragraph 1.13 to illustrate a comprehensive and accurate picture of current provision in Crawley.

Officer Response: The Council is aware of some corrections that are required to the database and maps within the PPG17 assessment and these amendments will be made through an update to the assessment before submission. The site in question sits within a Conservation area and any decision on whether this site, in full or part is suitable for residential development will be made once a review of the Worth Conservation Area is complete.

**Mr Tony Fullwood
Respondent Ref: 146746
On behalf of Mr Robinson**

Representation Summary: Support the option which undertakes a strategic review of open space with a review to releasing some underused sites, or where there is already sufficient provision. Objections are made elsewhere to the factual accuracy of the Open Space, Sport and Recreation Study which will require correction.

Nevertheless, the Study correctly identifies two of the main issues for open space provision in Crawley which have arisen through the strategic review as:

- new development which positively shapes open spaces, public parks, and sports or other recreational facilities is encouraged
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The land identified does not meet this definition. This definition should be removed from Worth Way and the evidence base corrected to accord with its purpose set out in Paragraph 1.13 to illustrate a comprehensive and accurate picture of current provision in Crawley.

Officer Response: The Council is aware of some corrections that are required to the database and maps within the PPG17 assessment and these amendments will be made through an update to the assessment before submission. The site in question sits within a Conservation area and any decision on whether this site, in

full or part is suitable for residential development will be made once a review of the Worth Conservation Area is complete.

TOPIC PAPER 12 – COMMUNITY FACILITIES, SERVICES AND INFRASTRUCTURE

Mrs Pippa Aitken
Respondent Ref : 147710
CB Richard Ellis (on behalf of The Homes and Communities Agency)

Representation Summary: The HCA considers that the definition of “infrastructure” in the adopted South East Plan is sufficiently wide ranging to encompass what will be required in a Crawley context. The local dimension comes from working with partner organisations involved in the provision of infrastructure, which will be an essential component of the Infrastructure Delivery Plan required by PPS12.

Officer Response: Noted.

Mr Peter Minshull
Respondent Ref: 148635
Highways Agency

Representation Summary: The HA would request clarification as to whether transport infrastructure will cover sustainable transport. While rail is noted as being covered by the transport infrastructure, it is not clear as to where bus services, pedestrian and cyclist facilities are included.

In order to fully comply with PPS12, the Council must have a robust, deliverable implementation plan and include details of phasing arrangements and funding sources. It will also be important to demonstrate the ability to identify a variety of funding sources to ensure that the infrastructure can be delivered.

The HA is happy to provide its own position statement.

Officer Response: The Council is intending to prepare a PPS12-compliant *Infrastructure and Implementation Plan* to accompany the

Core Strategy Review, which will encompass sustainable modes of transport, such as bus, rail, cycling, walking etc.

The Council would welcome a position statement from the Highways Agency.

Mrs Jenny Frost
Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: The definition in the South East Plan seems to encompass most aspects, though there is no mention of cultural activities such as museums, galleries, theatres, or spaces for festivals. However infrastructure is defined, it should precede development, not follow it.

Officer Response: Whatever definition is used, it will need to incorporate a degree of flexibility, which would potentially enable cultural facilities to be included if a *need* was identified.

The Core Strategy Review will have to adopt the approach to infrastructure set out in the South East Plan, which in Policy CC7 states that appropriate infrastructure should be delivered in a timely manner alongside development. The independent Panel of Inspectors, who conducted the Examination into the South East Plan, considered that requiring infrastructure in advance of development was neither sound in concept nor realistic in practice.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

Representation Summary: University and hospital are top of the list of infrastructure requirements

Officer Response: The suggestions are noted.

Miss Claire Tester
Respondent Ref: 149286
Mid Sussex District Council

Representation Summary: Constraints on infrastructure in this part of the region are well known. There needs to be an acknowledgement that joint working with adjacent local authorities to plan for infrastructure to support future development 'at Crawley' will be required. For example, the South East Plan in GAT3 which requires the preparation of water cycle which would be to be prepared with Crawley and adjacent authorities. It is also important that cross boundary working takes places regarding transport planning.

Officer Response: Agreed and the Council will be looking to continue the cross boundary working that has already been established.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: The obvious matter in a town of circa 100,000 residents is the lack of a general hospital, it appears that procrastination has prevented one being built. The main access road routes into Crawley require major improvement – it will be important to accept that most people entering Crawley will arrive by car, only a few will travel by train, bus, bicycle or on foot.

Officer Response: The Council has been liaising with West Sussex PCT with regards to the health facilities provided in the borough. Indeed, the shared Position Statement agreed with the PCT earlier this year can be viewed on the Council's website. As set out in the position statement, the PCT consider that there is currently an appropriate provision of health facilities to serve Crawley's residents. The Council will continue to meet with the PCT to

monitor this situation and plan for the town's growth through the Core Strategy.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: Supports current approach and Potential Direction sets out a sensible provision to the base definition on that used in the SEP and liaison with key stakeholders is encouraged.

Officer Response: Noted.

Ms Lucy Biddle
Respondent Ref: 150144
RPS (on behalf of Sussex Police)

Representation Summary: Rather than adopting a locally specific definition of infrastructure, which may limit opportunities to seek infrastructure during the life of the plan, the Core Strategy Review should incorporate the South East Plan definition of infrastructure as contained within SEP Policy CC7. Sussex Police welcomes the opportunity to engage with officers to review existing infrastructure within the police service, and the need for new infrastructure to support proposed development (including development phasing, funding sources, and bodies responsible for delivery).

The police would seek to secure developer contributions towards the capital costs of development. In terms of the Community Infrastructure Levy, it is recommended that the Core Strategy incorporate policy which refers to planning obligations and Section 106 Agreements, until a replacement process is introduced. It may be appropriate to incorporate an intention to review the method of delivery contributions following the introduction of CIL, if implemented.

Officer Response: Note support for relying on the South East Plan's definition of infrastructure.

The Council has adopted a Planning Obligations and Section 106 Supplementary Planning Document (SPD). It has not been considered appropriate in the Crawley context to seek contributions to policing. This is because the police are funded through a specific element of the Council Tax. Furthermore, it is the Council's current understanding that no further police facilities are proposed in Crawley.

Note suggested approach for CIL and Planning Obligations and S106 Agreements. The Council will continue to monitor the situation.

Mr Charles Collins

Respondent Ref: 150201

Savills (on behalf of Crest Nicholson Developments)

Representation Summary: 1. What constraints are there with the Borough's existing infrastructure and what are perceived to be the issues with future development?

Major constraints are considered to surround transport, secondary schools and waste water.

Traffic congestion will become an even more serious issue in the period to 2026. A range of bold initiatives will be needed to reduce car uses, possibly based on the already successful Fastway scheme. Rail expansion will also be needed.

A number of secondary schools in Crawley are at or near capacity. The school sites are well located, with room for expansion. West Sussex County Council should be offered opportunities (and perhaps financial incentive through development) to increase school capacity. There will be

a role (but not exclusive) for planning obligations from new development to assist.

The Sewage Treatment is the responsibility of Thames Water, who urgently need to increase capacity to facilitate the growth and renaissance of the town.

The role of Council (or wider) funding to assist or 'kickstart' major development, including TCN and parts of West of Bewbush may also be considered. The Council may consider forward funding developments, followed by 'claw back' schemes. The use of Bonds could also be considered. All these mechanisms could form part of the infrastructure and development delivery strategies.

It would be advisable for a draft Borough wide infrastructure delivery paper to be formulated prior to Proposed Submission to outline proactively the strategies to facilitate change. The Core Strategy should be 'implementable' and not be a regulatory land use plan.

Further guidance on Infrastructure Planning has just been made available by the Planning Advisory Service, including a step by step guide:

<http://www.pas.gov.uk/pas/core/page.do?pagelid=85827>

Officer Response: Over the coming months the Council will begin to prepare an Infrastructure *and Implementation* Plan to accompany the Core Strategy Review and PAS' Infrastructure Planning Guide will be used to inform its preparation.

The Council has already been liaising with the main infrastructure providers in the borough and the current position statements can be viewed on the Council's website. For instance, West Sussex County Council have indicated that by 2026 they consider that the town is likely to need approximately 4 new primary schools and 1 new secondary school and extensions to existing provisions to meet the demands of an additional 7,500 homes. It is appreciated that this will be dependent upon the capacity of the existing establishments

over this period. These will need to be included in the *Infrastructure and Implementation Plan* and planned for accordingly.

In appropriate circumstances, the Council will consider options for 'front-loading' infrastructure provision to aid delivery, however, it will be dependent upon sufficient funding being available.

Mr David Sims
Respondent Ref: 150417
Southern Water Services

Representation Summary: Southern Water is committed to meeting demand arising from new development as identified in adopted development plans. Development should not be allowed to proceed before the necessary infrastructure to serve it is available. OFWAT takes the view that when new properties are connected to the water network, costs incurred should be financed through developer contributions.

Formal requisition procedures set out in the Water Industry Act 1991 provide the legal mechanism for developers to provide infrastructure, and Southern Water looks to the Council to support this approach. Existing below ground water infrastructure should be protected. An updated position statement accompanying this representation provides further guidance.

Officer Response: Noted. Updated Position Statement is welcomed and will be made available on the Council's website. The Council will continue to work with Southern Water.

Miss Vicky Aston
Respondent Ref: 150433
Sport England

Representation Summary: The definition of infrastructure used in the South East Plan is applicable to Crawley. The definition of infrastructure

should therefore include social infrastructure, such as sports centres, open spaces, parks and play space, and green infrastructure, including outdoor sports facilities.

With regards planning for the provision of social and green infrastructure in the core strategy review, the Council should refer to the evidence base collected to support the adopted core strategy, which underpins the need for, and quality of, sport and recreation facilities. Where this information is out-of-date, the Council should seek to update this work to ensure a sufficient evidence base is in place to inform planning decisions up to 2026. Sport England provide a number of tools to assist with these assessments. When putting together the Council's policy on CIL or planning obligations, sport should be adequately provided for as part of new development areas.

Officer Response: Support of South East Plan definition of Infrastructure is noted.

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: Consider green infrastructure and the vital environmental services it can provide is an important element of infrastructure. If designed into a well connected network, green infrastructure can deliver social, environmental and economic benefits. See enclosed leaflet - Make the Connection an Ecological Network for Sussex

Officer Response: Green Infrastructure will form an important part of the Infrastructure and Implementation Plan that is being prepared to accompany the Core Strategy Review, so the background document provided will be useful.

Mr David Wilson
Respondent Ref: 150888

Thames Water Plc

Representation Summary: The Core Strategy should include a separate infrastructure policy on waste water management, to accord with the South East Plan, in particular Policy NRM2 relating to water quality, and the need to ensure that adequate wastewater and sewerage capacity is provided to meet planned demand (suggested policy wording and supporting text is included to this effect).

Thames Water has applied for additional treatment capacity to be made available at Crawley Sewage Treatment Works during the next funding period (AMP5 2010-2015) to provide capacity up to 2021 based on the housing requirements of the South East Plan (Secretary of State's Proposed Modifications). A further policy designed to facilitate the provision of appropriate water supply and waste water infrastructure facilities is suggested.

Officer Response: Suggested policies will be considered as the Core Strategy Review progresses. In addition, the Council will continue to meet with Thames Water.

Ms Rose Freeman
Respondent Ref: 151043
The Theatres Trust

Representation Summary: The cultural infrastructure of town centres where theatres are normally located has been inadequately recognised in policy statements eg PPS6 and PPS12 omits any guidance on the formulation of cultural policies that could encompass the protection and promotion of theatre use. The concern is that if LPA's follow this guidance they will have no basis for the formulation of planning obligations related to cultural facilities and theatre. Also there is no definition of 'community facilities'. This should be defined for greater clarity and certainty of outcomes. Would recommend 'community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community' to ensure arts activities and theatre will be incorporated into

any policy that mentions the enhancement and development of community facilities.

Officer Response: Note suggested wording for infrastructure definition. This will be considered as the Core Strategy Review is progressed.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: WSCC is actively working with CBC to clarify what future WSCC services are likely to be required. There should also be a reference to Supported Housing - evidence supplied.

Officer Response: The Council welcomes the involvement of WSCC in helping to prepare the Infrastructure *and Implementation* Plan that will accompany the Core Strategy Review.

The Council will consider the merits of including supported housing either within a revised Planning Obligations and Section 106 SPD or as part of CIL over the coming months as the Core Strategy Review is progressed. Welcome supporting information.

Mr Hubbard
Respondent Ref: 151662

Representation Summary: Some houses in Fernhill are not on main sewerage system

Officer Response: Noted.

Mr J Chessman

Respondent Ref: 151878

Representation Summary: Barely considering infrastructure and no hospital.

Officer Response: It is essential that sufficient infrastructure is provided to support the town's continued growth. The Infrastructure and Implementation Plan being prepared to support the Core Strategy Review will help achieve this.

The Council has been liaising with West Sussex PCT with regards to the health facilities provided in the borough. Indeed, the shared Position Statement agreed with the PCT earlier this year can be viewed on the Council's website. As set out in the position statement, the PCT consider that there is currently an appropriate provision of health facilities to serve Crawley's residents. The Council will continue to meet with the PCT to monitor this situation and plan for the town's growth.

Mrs J Raish**Respondent Ref: 152264**

Representation Summary: There should be more green areas, play areas, health centres and special places for the elderly to live in. Schools are overcrowded.

Officer Response: These comments are noted. It is essential that sufficient infrastructure is provided to support the town's continued growth. The Infrastructure and Implementation Plan being prepared to support the Core Strategy Review will help achieve this.

Mr B Wharton**Respondent Ref: 152314**

Representation Summary: As usual with Crawley and the South East of England, everything requires space. The size and density of Crawley's population means there is little land inside the built up area to handle further rapid and large population increases. Crawley is big enough to generate a separate satellite town.

Officer Response: See Officer Responses to Topic Papers 1 and 5.

Mr Tim Hoskinson**Respondent Ref: 150185****Savills (on behalf of the Gatwick Green Consortium)**

(For full comments see rep)

Representation Summary: The SEP acknowledges the importance of the Gatwick Diamond Initiative. It is essential that the Core Strategy Review acknowledges and plans for the infrastructure requirements that will be required if the sub region is to fulfil its economic potential. Relevant issues will be the phasing, timing and quantum of delivery, and the need to ensure that these reflect the ability of developers to bring forward or contribute to the desired infrastructure requirements

Continued improvements to public transport and highway infrastructure would assist the sub region to fulfil the economic potential clearly identified in the SEP and the Gatwick Diamond Futures Plan. These will require a strong partnership approach between CBC, DfT and the HA and Railtrack and other rail and bus operators.

(more detail in rep)

Officer Response: The Council is intending to prepare a PPS12-compliant *Infrastructure and Implementation Plan* to accompany the Core Strategy Review, which will need to cover issues such as phasing, timing, *funding*, delivery agencies etc. Agree that it will be important to ensure that the *Infrastructure and Implementation Plan* reflects Crawley's role in the sub-region.

As set out in Topic Paper 8: Transport, it will essential to ensure that the borough's transport network can support continued growth in

the area. To this end, the Council will be preparing a Transport Strategy with the partners detailed by the respondent.

Mr Derek Meakings
Respondent Ref: 151803

Representation Summary: With the increased population and appalling road access to East Surrey Hospital it is essential to have a Crawley A&E and general hospital.

If the North East Sector is developed then the potential major road problems created by the currently proposed changes to the Balcombe Road will create a further potentially disastrous problems (definitely cause problems for access from the south to East Surrey Hospital) whenever the M23 and/or M25 east of the M23, become blocked and traffic uses the A25/A22 and other country roads to access Gatwick. Access to the Gatwick M23 junction from the east must be developed.

All neighbourhoods must be made "Home Zones" with significant inter connectivity between neighbourhoods to encourage walking and cycling.

To provide access to Gatwick from the west the proposed West of Ifield development must include a west/northern by pass.

Officer Response: The Council has been liaising with West Sussex PCT with regards to the health facilities provided in the borough. Indeed, the shared Position Statement agreed with the PCT earlier this year can be viewed on the Council's website. As set out in the position statement, the PCT consider that there is currently an appropriate provision of health facilities to serve Crawley's residents. The Council will continue to meet with the PCT to monitor this situation and plan for the town's growth.

In addition, the Council is part of the East Surrey Hospital Transport Group which meets on a regular basis to consider how to improve transport links to the hospital.

The Transport Strategy will need to consider the impact of major developments, such as the North East Sector, on the borough's transport network.

Sections of the recent Pembroke Park development in Three Bridges incorporate 'Home Zone' features and the Council is broadly supportive of such measures in appropriate locations.

Note comments in relation to relief road.

Miss Charlotte Yarker
Respondent Ref: 149393
On behalf of Rydon Homes, Wates Developments Limited and Welbeck Land Limited

Representation Summary: It is the view of the Consortium that the Council should consider the introduction of the CIL in the context of other obligations that developers may be required to make in order to ensure that schemes do not become unviable as a result of the requirements made upon developers.

Officer Response: Note comments. If the Council does decide to implement CIL then the Charging Schedule will need to incorporate a viability assessment.

TOPIC PAPER 13 – SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITAT REGULATIONS ASSESSMENT

Miss Katie Gosling
Respondent No: 148072
Environment Agency

Representation Summary: Topic Area A covers climate change and sustainability, though there is no mention of water supply, and water quality is not really addressed. We recommend SUDS wherever possible and the role of SUDS in managing flood risk should be acknowledged, particularly its role in improving ground and surface water quality. An indicator could be the number of new developments to incorporate SUDS into their drainage design. A policy which includes a pollution prevention aspect to the design of surface water drainage systems should be incorporated. It is not clear what is meant by 'protect water resources'. In relation to Indicator A9, it should be noted that the Environment Agency does not object to planning applications on grounds of water quality concerns, and it will be difficult to assess this aspect of the indicator. Topic Area E fails to mention water quality. A minor aquifer is present in the south east of the Borough and this resource should be protected from pollution, and where possible, its quality should be enhanced.

Officer Response: Comments concerning water quality and the role of SUDS in reducing flood risk are noted and the SA produced in support of the Preferred Strategy can address this issue. In terms of a policy for pollution prevention, if locally distinctive issues exist, then this may be a possibility, however, additional research will be required. Indicator A9 is a Core Output indicator set by Government and is included to ensure a consistent approach to monitoring exists. The information for this indicator is published by the Environment Agency. The presence of an aquifer is noted.

Mr Ian Dunsford
Respondent Ref: 148452

Government Office for the South East

Representation Summary: The topic areas cover the SEA requirements and will help to inform policy development in the emerging DPD. Note that RSS was adopted in May 2009

Officer Response: Noted

Mr P Minshull
Respondent Ref: 148635
Highways Agency

Representation Summary: The HA consider that traffic and transport related indicators should form a key part of the SA and would request that some traffic related indicators are added (some examples are provided). Further suggestions are made with regards to the objectives. The HA considers that the proposed indicators, in addition to those it has suggested, will provide a satisfactory monitoring framework.

Officer Response: The indicators suggested are noted and their inclusion will be considered as part of the formulation of the draft SA.

Mrs Barbara Childs
Respondent Ref: 148734
Horsham District Council

Representation Summary: Page 2 para 2.3 - the UK sustainability Strategy 'A better Quality of life' was actually published in 1999 and identified 4 aims of sustainable development. The 5 principles of Sustainable Development identified in para 2.3 were introduced in the 2005 doc 'securing the future' which updated the strategy.

Officer Response: Noted

Mrs Marian Ashdown
Respondent Ref: 149542
Natural England

Representation Summary: HRA: Natural England are aware that MSDC in conjunction with WDC have already undertaken some research into visitor pressure on Ashdown Forest SPA/SAC and the distances that visitors travel to get there. Recommend talking to these authorities to determine the likely significant effects.

Scoping Report: Topic Area E - Section 3.72 states that securing funding for the management and improvement of areas of ecological and biodiversity value is largely outside the remit of the LDF. Some other LAs have included policies for developers to provide a financial contribution to green infrastructure - this is something that could be explored by CBC.

Scoping Report: Topic Area G - Section 3.116 Accessible Green Spaces should be included as an indicator for this topic area. Natural England recommends that people living in urban areas should have:

- An accessible natural greenspace less than 300 metres (in a straight line) from home;
- Statutory Local Nature Reserves provided at a minimum level of one ha per 1,000 people;
- At least one accessible 20ha site within 2km of home and one accessible site of 500ha within 10km of home.

Officer Response: The Council is already in discussion with Mid Sussex District Council regarding the Ashdown Forest data that exists with the view to incorporating it within Crawley's potential HRA.

The Council's current S106 Supplementary Planning Document collects contributions from developers for open spaces, sport and recreation where deficiencies exist. The Council will consider whether this could be expanded either through a revision of the existing Planning Obligations and S106 Agreements SPD or in producing the Community Infrastructure Levy.

Note suggested greenspace indicators. This will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Mr K.P. Greenleaves
Respondent Ref: 149898
Pound Hill Residents Association

Representation Summary: I look forward to the publication of a second screening report later this year.

Officer Response: Noted.

Mrs Julia Dawe
Respondent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: "Agrees with proposed topic areas.

In addition to 'minimising the effects of climate change' in topic A, Objective 1, wording could be added to promote the 'adaptation to the impacts of climate change', for example urban greening. Also, Topic A covers Air quality although this is not translated into the objectives. This should be mentioned specifically given the air quality issues associated with Gatwick Airport and the impacts this may have on environmental and health and wellbeing."

Officer Response: Note comment. This will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

Representation Summary: SWT would like to see in combination effects and future needs in terms of adaption to climate change properly assessed within this process. Sussex Biodiversity Record Centre holds biodiversity data for Sussex. Up to date ecological information derived from surveys is vital to the evidence base.

Officer Response: The in-combination effects will be incorporated within the SA once a policy direction is developed and the draft SA will provide more details. Furthermore, reference to adaptation to the impacts of climate change will also be considered further in preparing the draft SA. The SWT ecological data is noted.

Cllr Chris Cheshire
Respondent Ref: 150813
TAG

Representation Summary: Whilst noting that the main thrust of this topic area concerns the provision of dwellings, our main concern is the development of policies that ensure appropriate provision. This echoes 2.2 in the Scoping Report regarding sustainable development. We would add to the evidence quoted under paragraph 3.39 (Section C) to refer to the acknowledged need to provide accessible accommodation for increasing numbers of disabled people of all ages able to live independently in the community.

Reference should also be made to the increasing pressure on Disabled Facilities Grant Funding, and the waiting list for aids and adaptations work for Crawley Homes. The acceptance of such need is welcome, as expressed in Topic Area G. We believe that it should be policy that all social housing facilitated by Crawley Borough Council should be built to Lifetime Homes standard.

Consideration should also be given to encouraging the building of Lifetime Homes by private developers by setting percentage targets. It is currently policy in Wales and Northern Ireland that all public sector funded housing

will be built to Lifetime Homes standard. This is due for implementation in England from 2011.

Officer Response: Noted. This issue will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Mr Jim Piercey
Respondent Ref: 150821
Crawley Older Person's Forum

Representation Summary: Whilst noting that the main thrust of this topic area concerns the provision of dwellings, our main concern is the development of policies that ensure appropriate provision. This echoes 2.2 in the Scoping Report regarding sustainable development. We would add to the evidence quoted under paragraph 3.39 (Section C) to refer to the acknowledged need to provide accessible accommodation for increasing numbers of disabled people of all ages able to live independently in the community.

Reference should also be made to the increasing pressure on Disabled Facilities Grant Funding, and the waiting list for aids and adaptations work for Crawley Homes. The acceptance of such need is welcome, as expressed in Topic Area G. We believe that it should be policy that all social housing facilitated by Crawley Borough Council should be built to Lifetime Homes standard.

Consideration should also be given to encouraging the building of Lifetime Homes by private developers by setting percentage targets. It is currently policy in Wales and Northern Ireland that all public sector funded housing will be built to Lifetime Homes standard. This is due for implementation in England from 2011.

Officer Response: Note comments. This will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Ms Rose Freeman
Respondent Ref: 151043
The Theatres Trust

Representation Summary: No definition of 'community facilities'. This should be defined for greater clarity and certainty of outcomes. Would recommend 'community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community' to ensure arts activities and theatre will be incorporated into any policy that mentions the enhancement and development of community facilities

Officer Response: Agree that a clearer definition should be beneficial although it is considered that this should be relatively flexible to allow for any circumstances that arise. This will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary: For the next stage a Mitigation Action Plan is required to deal with negative impacts that cannot be overcome by suitable option choice and the final Core Strategy Review, after amendment of the Strategy as a result of the SA/SEA outcomes.

Consider that the key issues facing the borough have been identified. Furthermore, the Topic Areas are considered to be fine but one objective needs rewording (suggested wording provided). Plus should there be more objectives within the Topic Areas?

More indicators are needed to develop a satisfactory monitoring framework (e.g. a further air quality indicator is recognised as needed in the SEA scoping report).

Further detailed comments provided on each Topic Area.

Officer Response: Appreciate suggested wording and more detailed comments. These will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: It is difficult to see how the creation of 7,500 new homes can really be seen as sustainable.

Please see my comments to other topics

Officer Response: It is the Council's responsibility to ensure that the borough continues to grow in a sustainable manner and enable both new and existing residents to enjoy a high quality of life. The SA will help the Council achieve this by considering economic, environmental and social impacts equally and proposing mitigation measures where conflicts arise.

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Over the last decade it seems economics have been the only concern. The environment in this area has been hammered for decades due to constant growth and sprawl and tons of infill development. Having a decent place to live is not just about employment.

Crawley currently manages to combine employment, good housing, pleasant green corridors whilst having lots of shops and industry and recreational facilities. The council cannot juggle all the various aspects of development that the Government has proposed and succeed. The last decade has seen parts of Crawley ruined by the initial stages of the South East Plan.

Officer Response: It is the Council's responsibility to ensure that the borough continues to grow in a sustainable manner and enable both new and existing residents to enjoy a high quality of life. The SA will help the Council achieve this by considering economic, environmental and social impacts equally and proposing mitigation measures where conflicts arise.

Mr Tim Hoskinson
Respondent Ref: 150185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: The proposed topic area in relation to the economy should refer to the need for a strategic employment provision to address the wider regional and sub regional policy framework established through the SEP, the RES and Gatwick Diamond Futures Plan

Refer to Gatwick Green Baseline Environment and Utilities Report, Sustainability Strategy and Alternative Site Assessment

The key issues facing the borough include the need to provide for a strategic employment allocation to meet regional and sub regional requirements and allow the Crawley Gatwick area to compete effectively with other areas in the South East and internationally

The sustainability objectives proposed do not fully reflect the Futures Plans *(further detail in rep)*

The proposed indicators do not appear to be clearly set out in the topic paper

Officer Response: Note suggestions for additional Background Documents.

Note the other comments. These will need to be considered further by Council produces the draft SA to accompany the Preferred Strategy.

Mr Tony Fullwood
Respondent Ref: 146753
On behalf of Mrs Williams

Representation Summary: Object to SA Objective 3.
The objective as currently worded does not recognise the national objective of enhancing culturally valuable areas such as Conservation Areas (as set out in PPG15), AONBs (as set out in PPS7), sites of archaeological interest and of their settings (PPG 16) some of which are not located within the town. Objective 3 should be reworded as follows:
Sustainability Appraisal Objective Three – To protect and enhance the culturally valuable areas and buildings and valued built environment and character through high quality new design

Object to SA Objective 4:
The objective as currently worded does not seek to deliver the RSS housing requirement and so ensure that all have access to a decent home. Objective 4 should be reworded as follows:
Sustainability Appraisal Objective Four - Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home by maximising the use of land to deliver housing that meets the needs and aspirations of the Borough.

Officer Response: Disagree with comment on Objective 3. The proposed Sustainability Appraisal Objective as worded suggests that the culturally valuable areas of the town etc, can only be protected and enhanced by new development. This may not be the case. However, agree that 'town' should be replaced with 'Borough'.

Agree that Objective 4 should be revised to: 'To ensure that everyone has the opportunity to live in a decent and affordable home'. The issue

of sustainable construction is already addressed through Sustainability Appraisal Objective One.

Mr Tony Fullwood

Respondent Ref: 146746

On behalf of Mr Robinson

Representation Summary: Object to SA Objective 3.

The objective as currently worded does not recognise the national objective of enhancing culturally valuable areas such as Conservation Areas (as set out in PPG15), AONBs (as set out in PPS7), sites of archaeological interest and of their settings (PPG 16) some of which are not located within the town. Objective 3 should be reworded as follows:

Sustainability Appraisal Objective Three – To protect and enhance the culturally valuable areas and buildings and valued built environment and character through high quality new design

Object to SA Objective 4:

The objective as currently worded does not seek to deliver the RSS housing requirement and so ensure that all have access to a decent home. Objective 4 should be reworded as follows:

Sustainability Appraisal Objective Four - Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home by maximising the use of land to deliver housing that meets the needs and aspirations of the Borough.

Officer Response: Disagree with comment on Objective 3. The proposed Sustainability Appraisal Objective as worded suggests that the culturally valuable areas of the town etc, can only be protected and enhanced by new development. This may not be the case. However, agree that 'town' should be replaced with 'Borough'.

Agree that Objective 4 should be revised to: 'To ensure that everyone has the opportunity to live in a decent and affordable home'. The issue of sustainable construction is already addressed through Sustainability Appraisal Objective One.