CRAWLEY BOROUGH COUNCIL
PLANNING AND CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT
REGULATION 12 CONSULTATION STATEMENT
OCTOBER 2016

1. Introduction
1.1. This Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, and ‘Getting Involved’, Crawley Borough Council’s Statement of Community Involvement (SCI). It also has regard to the requirements of the National Planning Policy Framework (2012).

1.2. Regulation 12 of the Local Planning Regulations requires that before a local planning authority adopts a Supplementary Planning Document (SPD) it must prepare a statement identifying the persons who have been consulted in the preparation of the document, the main issues raised by them, and the manner in which these have been addressed. The present document is that statement. An earlier version was made available alongside the SPD for the purpose of seeking representations as part of a public consultation and has been updated accordingly.

1.3. ‘Getting involved … in planning’, an appendix to the council’s SCI requires that local planning documents be subject to a period of ‘early engagement’ prior to formal consultation, providing opportunities for interested stakeholders and individuals to feed into the preparation of the document. In setting out the details required by Regulation 12 as mentioned above, this document provides a summary of the ‘early engagement’ process and the formal statutory consultation.

2. Involve: Stage 1 – early engagement
2.1. Early in October 2015, the council contacted all those parties who had previously asked to be kept informed about the progress of the Crawley Borough Local Plan\(^1\), highlighting the fact that the council proposed to produce a group of SPDs across a range of identified topics, including climate change. Those contacted were invited to sign up for further updates in relation to particular topics, and directed to a page on the council’s website providing further information about the function of the SPDs and their proposed scope. The web page also invited interested parties to respond to nine broad questions about their coverage and approach.

2.2. Alongside this engagement with contacts from the council’s Local Plan database, invitation was sent to members of the council to express their interest in particular SPDs. The SPDs and the associated web page were also publicised via the council’s main web page.

2.3. In response to these communications a number of parties, including external stakeholders and council members, confirmed their desire to be kept up to date with progress with the SPDs, including the Planning and Climate Change

\(^1\) See Appendix A for details of the materials used as part of the general Early Engagement consultation.
One respondent provided further comment, focusing mainly on the relevance to the SPD of the 2011 National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3). It was felt, however, that the contents of the NPS did not materially affect the scope or purpose of the SPD. No further responses were received regarding the nine broad questions mentioned above.

2.4. On 20 January 2016 a seminar was held for council members at which the proposed focus and approach of each SPD currently being worked on was summarised, and questions and comments were invited. Members emphasised the importance of making the document as accessible as possible for the layperson, and suggested the inclusion of a number of specific topics, which the current draft has sought to incorporate.

2.5. Concurrently with these engagement exercises, a number of internal and external stakeholders were invited to provide comment on individual SPDs where the council considered that their expertise would be particularly valuable in the early drafting work. Technical comments and advice was received from the Environment Agency, West Sussex County Council, Gatwick Airport Ltd. (Aerodrome Safeguarding), Sussex Building Control, Crawley Borough Council’s Development Management and Environment Teams, and Islington Energy Services, London Borough of Islington. The consultation draft SPD was amended to incorporate comments and amendments as suggested on emerging draft versions.

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

3.1. A formal stage of public consultation was undertaken on a draft version of the Planning and Climate Change SPD. The draft document was made available for representations over a four week period between Tuesday 1 March and Tuesday 29 March. This consultation was undertaken in accordance with regulation 12. (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, and ‘Getting involved… in planning’, the appendix to the council’s Statement of Community Involvement.

3.2. The SPD was accompanied by a Guidance Note on Energy and Water Efficiency for Alterations and Extensions to Buildings. This does not form part of the SPD, nor is it intended to have the same status in relation to the planning process. It is nonetheless intended to complement the SPD, and is referred to within it. On this basis, it was included within the consultation both in order to clarify the scope of the SPD and to enable representors to comment on it in its own right.

3.3. All consultees included on the council’s Local Plan consultee database were emailed or written to with notification of the commencement of the consultation. A further reminder email was circulated highlighting the close of consultation date. The consultation materials are set out in Appendix B of this consultation statement.

3.4. During the representation period the draft Planning and Climate Change SPD was available to view online at [www.crawley.gov.uk/crawley2030](http://www.crawley.gov.uk/crawley2030). Paper copies of the documents were available at the following locations during normal office hours:

- Town Hall
- Crawley Library
- Broadfield Library

3.5. The consultation draft SPD included a number of specific questions to aid the consultation process. These were set out within the document, both
Representations Received

3.6. Representations had to be provided in writing. This could be done either by emailing the Forward Planning team or by post. Representations received during the consultation period are set out in tabular form in Appendix C. The council’s responses to the comments received are provided in the same table, this includes reference to where the representation received have led to changes in the final SPD.
APPENDIX A: EARLY ENGAGEMENT MATERIALS

1. GENERAL CONSULTATION QUESTIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Kind Regards,

The Forward Planning Team

More information
For more information, please visit our website www.crawley.gov.uk/crawley2030 where you can find details of the Local Plan and preparation of the new Supplementary Planning Documents.
Contact us
If you would like to contact the Forward Planning Team, please email us at forward.plans@crawley.gov.uk or you can phone us on 01293 428624.

Subscribe/unsubscribe
You have received this message as you have expressed an interest in being kept up-to-date with progress on Crawley’s Local Plan. If you would not like to receive these updates any more, please respond to this email and let us know. If you know anyone that would like to receive these updates please ask them to email us at forward.plans@crawley.gov.uk
Dear Sir or Madam,

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

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Yours Faithfully,

Elizabeth Brigden
Planning Policy Manager
4. SPECIFIC AND GENERAL CONSULTEES

Addaction
Afro Caribbean Association (ACA)
Age Concern West Sussex
Ahmadiyya Muslim Association UK (Crawley Branch)
Alternative Learning Community Bewbush
AMEC Environment & Infrastructure
BAPS Swaminarayan Santha
Barton Willmore
Black History Foundation
Blue Cedar Homes Limited
BME Ladies Health and Social Wellbeing Association
Bodhisattva Buddhist Centre
British Horse Society
British Humanist Society
Broadfield Christian Fellowship
Broadfield Youth and Community Centre
Campaign for Real Ale
CBRichard Ellis
Celtic & Irish Cultural Society
Central Crawley Conservation Area Advisory Committee
Central Sussex College
Chagos Island Community Association (CICA)
Chagos Islands Refugees group
Chagossian Elderly West Sussex Group
Charwood Parish Council
Churches Together in West Crawley
Colgate Parish Council
COPE
County Mall
Crawley Bangladeshi Welfare Association
Crawley Baptist Church
Crawley Campaign Against Racism
Crawley Clinical Commissioning Group
Crawley Community Relations Forum
Crawley Community Transport
Crawley Community Voluntary Service
Crawley Educational Institute
Crawley Ethnic Minority Partnership
Crawley Festival Committee
Crawley Homelessness Forum
Crawley Homes in Partnership (CHIP)
Crawley Interfaith Network
Crawley International Mela Association (CIMA)
Crawley Kashmiri Women’s Welfare Association
Crawley Mosque
Crawley Museum Society
Crawley Older Person’s Forum
Crawley Portuguese Association
Crawley Shop Mobility
Crawley Tennis Club
Crawley Town Access Group
Crawley Wellbeing Team
Crawley Young Persons Council
Cycling Touring Club
Darlington Warner Davis LLP
Deloitte LLP
Deloittes
Development Planning & Design Services Ltd
Diego Garcia Society
Divas Dance Club
DMH Stallard LLP
Drivers Jonas Deloitte
DTZ
East Sussex County Council
Eastern Stream
Elim Church Crawley
Equality & Human Rights Commision
Firstplan
Forestfield & Shrublands Cons. Area Adv Ctte
Freedom Leisure
Friends of Broadfield Park
Friends of Goffs Park
Friends, Families and Travellers
Fusion Experience
FusionOnline
Gambian Society
Gatwick Airport Limited
Gatwick Diamond
GL Hearn Ltd
Gleeson Strategic Land
Gurjar Hindu Union (GHU)
Health Through Sport Action
Heathrow Airport Holdings Limited
High Weald AONB Unit
Home Builders Federation Ltd
Housing & Planning Directorate
Housing 21
Hunter Page Planning Ltd
Hyde Housing Association
Iceni
Ifield Park Care Home
Ifield Village Conservation Area Advisory Committee
Ikra Women & Children Learning Centre
Inspire Broadfield (youth group)
Ismaili Council
Iyad Daoud
Jones Lang Lasalle
Kashmiri Educational and Welfare Trust
Kenneth Boyle Associates
Lewis & Co Planning South East Limited
Local Economy Action Group
Lower Beeding Parish Council
Maidenbower Baptist Church
Maidenbower Community Group
Malaika Sussex Multicultural Women’s Group
Manor Royal Business Group
Michael Simkins LLP
Millat-e-Jafferiyah (Shia Muslim Mosque)
MITIE Property Services Limited
Moat Housing
Montagu Evans
Muslim Women’s Forum
National Federation of Gypsy Liaison Groups
New Hope Church
Newdigate Parish Council
Northgate Matters
Oakton Developments
Outreach 3 Way
Parish of Worth, Pound Hill and Maidenbower
Parker Dann Limited
Pegasus Group
Pembroke Residents Association
Persimmon Homes
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Reniece Robinson
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Josie Stannard
Libby Stannard
Roy Stannard
Kay Stannard
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Rosie Cavedaschi
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Rosemary Benwell
Rory Church
Ronnie Armstrong
Rohan Patel
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Rhoda James
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Reuben Peters
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Remo Lula
Aaron Squirrell
Maretta Rees
Reece Church
Mr Reece Tate
Kelly Byworth
Stephen Leake
Rebecca Betteridge
Rebecca Holt
Mr Burgess
Mrs Burgess
Rudi Bird
Christopher Vincent Gartian
Katerina Radova
Radhika
Rachel Price
Rachel Pamment
Georgina
Mr P Wakeham
Mrs I Wakeham
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Paul Thomas
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Sir / Madam
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Paul Berry
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Nick Pasheley
Mr P Akhtar
Parmjit Sidhu
Peter Parker
Pam James
Sarah Page
Julie Daly
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Christopher Wilkinson
Mandy Wilkinson
Nick Wilkinson
Rachael Wilkinson
Shaun Wilkinson
Neena Seeruthun
Andrew Towner
Martin Bates
Mrs Kim Nobbs
Nadine Terry
Anita Bateman
Nick Cornwell
Nick Edwards
Nicole Sullivan
Niall Kelly
Niall Nugent
Johnny Da Silva
Netta Bond
Vanessa Marriott
Neil Slugocki
Neil Donald
Natalie Bingham
Julie Roberts
Neil Smith
Natalie Saunders-Neate
Mr Nathan Spriggs
Natalie Chambers
Natalie Zevka
Mrs Natalie Moran
Natalie Sullivan
Naomi Wiggins
Nancy Weltner
Naiiya Slimani
M. Lashmar
Mr Michael Whiting
Maeve Weller
Laura Randall
Terry
Moustapha Kada
Mrs Janette Thompson
Linda Keynes
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Kara Bonner
Amanda Madel
Harry Madel
Trevor Madel
Samantha Wood
Mrs Sue Bristow
Margaret San Juan Martin
Shani Wheatley
Molly Rumble
Morag Warrack
Mohsin Ahmed
Mr M Richardson
Mr Martin Saunders
Jonathan Mitchell
Paul Lewis
Michael Petryszn
Mike Parker
Michael Eaton
Michael Simmonds
Mike Doyle
Maria Lula-Harris
Michael Schultz
Michelle Collins
Michele Singleton
Mike Jones
Pat Eldridge
Tony Sillince  
Ann Richardson  
Ann Harrington  
Anne Tullett  
Annette Gidman  
Anne Greenbrook  
Anne Fairbank  
Aisha Sidat  
Ania Jasko  
Angie Gasson  
Angie Crudgington  
Angela Cohen  
Angela Darbon  
Angela Cole  
Andy Tolfrey  
Billy Tolfrey  
Andrew Summers  
Andrew Jagger  
Jensen Jagger  
Madelaine Jagger  
Carlene Ahangama  
Linda Ahangama  
Mrs B Brown  
Andrew Judge  
Andrew Cusack  
Andrew Chan  
Lily Chan  
Andrew Skudder  
Mrs Andrea Richardson  
Andrea Roberts  
Ananda and Pieter  
Ana  
Ammarah Sidat  
Amy Young  
Amanda Stannard  
Mrs A Austin-Way  
Amanda Roskilly  
Amanda Jagger  
Amanda Parker-Small  
Joe Lavery  
Edward Page  
A Page  
Miss Allanna Dwyer  
Allan Lambert  
Georgina Allan  
Gina Allan  
Alan Burgess  
Alison Warner  
Alicia Haworth  
Alicia Cusick  
Alison Burke  
Mrs Alison Hollman  
Affie Jones  
Alexander Thrift  
Alex Harris  
Alex Petryszyn  
A and P Smith  
Alan Kenward  
Kathleen Kenward  
Ishtiaq Ahmed  
Alexander Wilbourn  
Adam Parker  
Adam Foxley  
Abi Watkins  
Abby Allen  
Aaron Lumley  
Mr Alexander Collins  
Antonio Percudani  
Mrs Audrey McKown  
Alan Hollman  
Sam Brown  
Jennifer  
Rhys Miller  
Alison Heine  
Perry Doherty  
Nelson Reid  
Alice Broomfield  
Heidi Kelly  
Andrew Metcalfe
5. CRAWLEY BOROUGH COUNCIL CRAWLEY 2030 SUPPLEMENTARY PLANNING DOCUMENT WEBPAGE

Crawley Borough Council :: Crawley 2030: Supplementary Planning Documents

Crawley 2030: Supplementary Planning Documents

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

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

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

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

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

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

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

- Householders
- Businesses
- Landowners

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

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

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

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

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

We welcome your views on the following questions.
General Consultation Questions

Q1: Do the topics identified cover the main areas requiring additional guidance?
Q2: Are any of the topics considered unnecessary?
Q3: Are there any additional topics which haven’t been identified as a Supplementary Planning Document with which the council should consider?
Q4: Are the policies identified to be covered by the SPDs appropriate?
Q5: Should any of the policies be addressed in a different SPD to that identified in the table?
Q6: Should policies only be covered by one SPD rather than considered by each relevant topic area?
Q7: Are there other policies in the Crawley Borough Local Plan 2016 – 2030 (Crawley 2030) that haven’t been identified which should be considered for inclusion in one of the SPDs?
Q8: Should the SPDs focus solely on statutory planning policy guidance or should they offer best practice examples and be used to provide advice and suggestions beyond the remit of planning policy, within the topic area?
Q9: Do you have any other, strategic comments on the scope and remit of the SPDs for consideration at this stage?

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

Next Steps

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

Consultation on the draft SPDs will take place following the receipt of the Inspector’s final report, and after the Local Plan has been formally adopted by the council by way of a resolution at its Full Council meeting. This is currently anticipated to allow for public consultation on the SPDs to be undertaken early in the New Year 2019.
APPENDIX B: STATUTORY CONSULTATION MATERIALS

1. PLANNING AND CLIMATE CHANGE SPD CONSULTATION QUESTIONS

Q1. Are there any ways in which the SPD could be made easier to use and navigate?

Q2. Are there any terms or concepts used in the policies or SPD text that require, or would benefit from, further explanation?

Q3. Are there any questions about the policy requirements, their interpretation, or their implementation as part of the planning process, which are not covered adequately, or at all, in the SPD?

Q4. Is there further information not provided in the SPD which is likely to help applicants to meet the policy requirements?

Q5. How can the SPD further help to mitigate the difficulties which applicants might encounter when addressing the policy requirements?

Q6. Are there any further common approaches/methods/technologies used by developers about which the SPD can usefully comment?

Q7. Are there important aspects of Crawley or particular localities/sites within the borough which should be discussed more prominently in the SPD?

Q8. Are there further examples of best practice in terms of environmentally sustainable development in Crawley or elsewhere which it would be appropriate to highlight in the SPD?

Q9. Are there any areas in which the proposed means of implementing the policies, as distinct from the policies themselves, create unnecessary obstacles for planning proposals? How do they do this? What alternatives are available?
Dear,

SUPPLEMENTARY PLANNING DOCUMENTS: CONSULTATION

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

- Planning and Climate Change
- Urban Design (including Parking Standards).

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

The documents are available to view on the council’s website: www.crawley.gov.uk/crawley2030spd and in hard copy at the Town Hall and the borough’s libraries during normal office hours.

Consultation will take place between 1 March and 29 March 2016. All responses must be made in writing, by 5pm 29 March 2016, and can be submitted either by email to forward.plans@crawley.gov.uk or by post to:

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

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

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

Kind Regards,
The Forward Planning Team

More information
For more information, please visit our website www.crawley.gov.uk/crawley2030spd.
Contact us
If you would like to contact the Forward Planning Team, please email us at forward.plans@crawley.gov.uk or you can phone us on 01293 428624.

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

SUPPLEMENTARY PLANNING DOCUMENTS: CONSULTATION

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

- Planning and Climate Change
- Urban Design (including Parking Standards).

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

Yours Faithfully,

Elizabeth Brigden
Planning Policy Manager
4. EMAIL REMINDER TO CONSULTEE DATABASE

LOCAL PLAN UPDATE
23 March 2016

Dear ,

SUPPLEMENTARY PLANNING DOCUMENTS REMINDER: CONSULTATION DEADLINE 5PM 29 MARCH 2016

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

- Planning and Climate Change
- Urban Design (including Parking Standards).

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

The documents are available to view on the council’s website: www.crawley.gov.uk/crawley2030spd and in hard copy at the Town Hall and the borough’s libraries during normal office hours.

The consultation period will close at 5pm 29 March 2016. All responses must be made in writing and can be submitted either by email to forward.plans@crawley.gov.uk or by post to:

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Crawley Borough Council
Town Hall
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Crawley
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If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or elizabeth brigden@crawley.gov.uk

Kind Regards,

The Forward Planning Team

More information
For more information, please visit our website www.crawley.gov.uk/crawley2030spd.
Contact us
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Subscribe/unsubscribe
You have received this message as you have expressed an interest in being kept up-to-date with progress on Crawley's Local Plan and/or the Supplementary Planning Documents. If you would not like to receive these updates any more, please respond to this email and let us know. If you know anyone that would like to receive these updates please ask them to email us at forward.plans@crawley.gov.uk
5. CRAWLEY BOROUGH COUNCIL CRAWLEY 2030 SUPPLEMENTARY PLANNING DOCUMENT WEBPAGE

Find It  Tell Us  Pay It  Apply

Locations: Home | Planning and Development | Planning Policy | Local Plan - Crawley 2030 | Crawley 2030: Supplementary Planning Documents

Crawley 2030: Supplementary Planning Documents

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

Update: Public Consultation 1 March 2016

Public consultation has now taken place on the following two Supplementary Planning Documents (SPDs):

- Planning and Climate Change
- Urban Design (Including Parking Standards)

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

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

If you have any questions relating to this public consultation, please contact Elizabeth Brignall, Planning Policy Manager on (01293) 438504 or email Elizabeth.Brignall@westsussex.gov.uk.

Planning and Climate Change

- Planning and Climate Change SPD
- Guidance Note: Energy and Water Efficiency for Adaptors and Extensions to Buildings
- Consultation Statement

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

- Policy ENW1: Sustainable Design and Construction
- Policy ENW7: District Energy Networks
- Policy ENW8: Development and Flood Risk
- Policy ENW9: Tackling Water Stress
- Policy IN3: Development and Requirements for Sustainable Transport

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

- Policy CH4: Normal Requirements of All New Development
- Policy ENW1: Green Infrastructure

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

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

Urban Design

- Urban Design SPD (4 MB)
- Parking Standards Plan (2 MB)
- Consultation Statement

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

It provides additional guidance in order for applicants to meet the requirements set by the following Local Plan Policies:
Policy CH1: Neighbourhood Principles
Policy CH2: Principles of Good Urban Design
Policy CH3: Normal Requirements of All New Development
Policy CH4: Comprehensive Development and Efficient Use of Land
Policy CH5: Standards for All New Dwellings (Including conversions)
Policy CH6: Important Views
Policy CH9: Development outside the Built-Up Area
Policy IN4: Car and Cycle Parking Standards

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

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

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

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

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

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

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

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

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

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

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

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

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

Involvement and Engagement
If you are interested in being involved and kept informed on the progress of the SPDs please contact Forward Planning with your name and contact details, along with the
topic area, or areas, you are interested in. You are welcome to be engaged in as many
or as few of the SPDs as you would wish to be.
We welcome your views on the following questions.

General Consultation Questions
Q1: Do the topics identified cover the main areas requiring additional guidance?
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Planning Document which the council should consider?
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table?
Q6: Should policies only be covered by one SPD rather than considered by each
relevant topic area?
Q7: Are there other policies in the Crawley Borough Local Plan 2015 – 2030 (Crawley
2030) that haven’t been identified which should be considered for inclusion in one of
the SPDs?
Q8: Should the SPDs focus solely on statutory planning policy guidance or should
they offer best practice examples and be used to provide advice and suggestions
beyond the remit of planning policy, within the topic area?
Q9: Do you have any other, strategic comments on the scope and remit of the SPDs
for consideration at this stage?

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

course.
APPENDIX C: CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES*

*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, offensive 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 deemed to be inappropriate, offensive or racist have been removed.

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| Gatwick Airport Limited – Aerodrome Safeguarding |               | **Planning & Climate Change Consultation Statement**  
No aerodrome safeguarding comments  
**Planning & Climate Change Draft Supplementary Document**  
We welcome the inclusion of aerodrome safeguarding in this document.  
**Guidance Note: Energy & Water Efficiency for Alterations & Extensions to Buildings**  
No aerodrome safeguarding comments                                                                 | Response noted. No further change felt to be required.                                                 |
| John Cooban                      |               | There is insufficient discussion or information (only one para re. policy CH3) on the importance of trees / urban forest / tree cover – both its contribution to meeting the challenges of climate change, as well as the | Noted. The commentary on policy ENV1 has been moved from CH3 to CH5, which is more appropriate.        |
### Climate Change Supplementary Planning Document

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<td>Gatwick Airport Limited</td>
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<td>reverse implications for our tree cover brought about by climate change – pests and diseases and extremes of weather. There is more attention given to green roofs – relevant but not as important in the scheme of things as urban tree cover. I acknowledge the references to more details being given in a forthcoming Green Infrastructure SPD, but suggest that reference to planning for trees / urban forest / tree cover should still be much more conspicuous in an SPD purporting to cover Planning and Climate Change.</td>
<td>The guidance and cross-reference to the Green Infrastructure has been given further emphasis, with links provided to further guidance at the end of the chapter. The emphasis should be on the role of GI in climate change mitigation/adaptation rather than the impact of climate change on GI, as this reflects the policy requirements.</td>
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Gatwick Airport Limited

**Introduction**
- Gatwick Airport Ltd (GAL) has been notified about the above mentioned Draft SPD Consultation.
- This note sets out GAL’s formal comments as an interested party in this Consultation and as the owner and operator of Gatwick Airport.
- GAL request to be notified of any amendments made to the Draft SPD Planning and Climate Change following the Public Consultation and of the next stages in progressing the Draft SPD.

**Background**

Gatwick Airport Limited (GAL) welcomes the opportunity to comment upon the new Crawley Borough Council Draft SPD Planning and Climate Change. Gatwick Airport Limited is a proactive stakeholder within the Crawley business community and a key driver for the economy of Crawley and the wider sub region.

Gatwick Airport offers an international gateway for Crawley to access in order to help boost its economic growth and expand the existing...
## Business Sector

Gatwick Airport is the UK’s second largest airport and the most efficient single-runway airport in the world. It serves more than 200 destinations in 90 countries for more than 40 million passengers a year on short and long-haul point-to-point services. It is a major economic driver for the South-East region, generating around 21,000 on-airport jobs and a further 10,000 jobs through related activities. The airport falls within Crawley Borough and is 28 miles from the UK’s main economic hub of London with excellent public transport links to the City, including the Gatwick Express.

The proximity of the airport to Crawley has had a significant influence upon not only the shaping of the economy of the Borough having a notable influence upon the sustainability footprint of Crawley. Planning for climate change is not only needed at an international and national level of the planning and development process but it is crucial that at a local and sub-regional level planning looks both at the project and strategic programme level to ensure sustainability is at the core of the planning system. Sustainable forms of development are the only types of development which should now be afforded consent by planning decision makers. Sustainable development is the overarching principle of the national planning system. GAL therefore considers it is crucial that we continue to engage in a long-term working partnership with CBC to support the aims of the Draft SPD in gaining effective environmental planning and sustainable forms in Crawley and of the wider Gatwick Diamond.

GAL has been fully engaged in the recent review process of the newly adopted ‘Crawley 2030’ Local Plan. GAL recognises that the SPD aims to provide greater detail to the Local Plan planning policies. In addition overall the key principles for achieving sustainable regeneration are actually embedded within the new CBC Local Plan which provides the

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<td>Business sector. Gatwick Airport is the UK’s second largest airport and the most efficient single-runway airport in the world. It serves more than 200 destinations in 90 countries for more than 40 million passengers a year on short and long-haul point-to-point services. It is a major economic driver for the South-East region, generating around 21,000 on-airport jobs and a further 10,000 jobs through related activities. The airport falls within Crawley Borough and is 28 miles from the UK’s main economic hub of London with excellent public transport links to the City, including the Gatwick Express. The proximity of the airport to Crawley has had a significant influence upon not only the shaping of the economy of the Borough having a notable influence upon the sustainability footprint of Crawley. Planning for climate change is not only needed at an international and national level of the planning and development process but it is crucial that at a local and sub-regional level planning looks both at the project and strategic programme level to ensure sustainability is at the core of the planning system. Sustainable forms of development are the only types of development which should now be afforded consent by planning decision makers. Sustainable development is the overarching principle of the national planning system. GAL therefore considers it is crucial that we continue to engage in a long-term working partnership with CBC to support the aims of the Draft SPD in gaining effective environmental planning and sustainable forms in Crawley and of the wider Gatwick Diamond. GAL has been fully engaged in the recent review process of the newly adopted ‘Crawley 2030’ Local Plan. GAL recognises that the SPD aims to provide greater detail to the Local Plan planning policies. In addition overall the key principles for achieving sustainable regeneration are actually embedded within the new CBC Local Plan which provides the</td>
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GAL is fully supportive of the production of a more detailed document Supplementary Planning Document (SPD) which will provide the planning policy detail needed by developers to ensure environmental standards are recognised in the early design stages of a scheme, and to add to the environmental robustness of development proposals within Crawley. The SPD will therefore be an important planning tool for achieving sustainable forms of development in Crawley.

Gatwick Airport Limited Consultation Comments:

In response to the Planning and Climate Change Draft SPD Consultation GAL would like to put forward the following comments:

GAL considers that the sections of Chapter 2 which deal with the need for a Sustainability Statement to be produced by developers is, in parts, rather confusing to fully and clearly understand. It may be useful to provide greater guidance (possibly a standalone guidance) on the format and required content of a Sustainability Statement. It is recognised that a single template may clearly not fit all proposals and that very pragmatically the Council is not seeking to be over prescriptive in its requirements. Whilst Appendix 3 does provide a satisfactory template GAL believes more detail needs to be provided on the level of information expected within a Sustainability Statements and an example of best practice. The Sustainability Statement will be required for various forms of consent including not only full planning consent but applications for change of use, outline permission etc. More detail on the scope of Sustainability Statements in GALs opinion may then positively contribute towards ensuring that the quality of such Sustainability Statements submitted with planning applications do serve to actually improve and expedite the planning process with the higher quality environmental

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<td>direction for future development within Crawley. GAL is fully supportive of the production of a more detailed document Supplementary Planning Document (SPD) which will provide the planning policy detail needed by developers to ensure environmental standards are recognised in the early design stages of a scheme, and to add to the environmental robustness of development proposals within Crawley. The SPD will therefore be an important planning tool for achieving sustainable forms of development in Crawley. <strong>Gatwick Airport Limited Consultation Comments:</strong> In response to the Planning and Climate Change Draft SPD Consultation GAL would like to put forward the following comments: GAL considers that the sections of Chapter 2 which deal with the need for a Sustainability Statement to be produced by developers is, in parts, rather confusing to fully and clearly understand. It may be useful to provide greater guidance (possibly a standalone guidance) on the format and required content of a Sustainability Statement. It is recognised that a single template may clearly not fit all proposals and that very pragmatically the Council is not seeking to be over prescriptive in its requirements. Whilst Appendix 3 does provide a satisfactory template GAL believes more detail needs to be provided on the level of information expected within a Sustainability Statements and an example of best practice. The Sustainability Statement will be required for various forms of consent including not only full planning consent but applications for change of use, outline permission etc. More detail on the scope of Sustainability Statements in GALs opinion may then positively contribute towards ensuring that the quality of such Sustainability Statements submitted with planning applications do serve to actually improve and expedite the planning process with the higher quality environmental</td>
<td>Noted. A number of changes have been made to try to simplify and clarify this section. Tables 2.1 and 2.3 have been combined, and table 2.2 has been removed to an appendix at the end of the document. In addition the guidance in paragraphs 2.7 and 2.8 has been expanded to try to give a clearer idea about the expected approach. At the same time, given the range of types of proposal falling within the terms of the policy, it is not considered appropriate to prescribe the format or content in detail. Sustainability/Energy Statements are an increasingly common</td>
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<td>standards being met - rather than Sustainability Statements acting as an additional planning document which is not fit for purpose as developers do not clearly understand or have access to the expected detail requirements. This could then be counterproductive resulting in delays the decision making process and ultimately in bringing more sustainable forms of development forward. The requirements in the SPD for a Sustainability Statement appear to be for the production of a detailed document which will also address the various and frequently complex aspects of energy efficiency in building and design as laid out in Section 3 of the Draft SPD. This compounds GAL's suggestion that more guidance is needed on the required contents of the Sustainability Statement as it is a wide ranging and detailed document and one which is imperative in successfully achieving planning consent. GAL is also uncertain from the Draft SPD as to the thresholds of when the proposal is deemed financially unviable to seek accreditation by BREEAM UK as indicated in Section 3.6 of the CBC document. GAL welcomes Section 3.23 which specifically addresses green roofs that the Draft SPD has noted the need for aerodrome safeguarding to be fully considered by developers. GAL fully supports the need for GAL be consulted on such aspects to ensure that there are no potential conflicts with development proposals and the safe and efficient operation of the airport. Similarly GAL strongly supports the Draft SPD Chapter 7 in the need for the promotion and integration of low carbon renewable technologies but planning requirement and this general approach is not particularly unusual. Where promoters of particular schemes are uncertain about requirements further advice is offered. The variety and complexity of the statement expected will depend on the proposal. It is not the council's intention to ‘catch out’ developers and slow the process by introducing hidden criteria, but to apply the adopted policy requirements in a proportionate way. Broad definitions of viability that have informed the policies are set out in the 2015 Whole Plan &amp; CIL Viability Assessment. Viability evidence in relation to individual proposals will be considered on a case-by-case basis. Noted. No further change felt to be required.</td>
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<td>Noted. The SPD currently addresses this appropriately within</td>
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<td>this must be with the clear recognition that some forms of renewable energy sources such as wind turbines may conflict with the statutory requirements of aerodrome safeguarding for Gatwick Airport. It is therefore imperative that that the draft SPD clearly identifies that scheme promoters who employ such low carbon energy sources should consult Gatwick Airport in order to avoid any potential conflicts of interest which could otherwise potentially stall a development gaining planning consent. GAL supports within Chapter 10 of the draft SPD that it has been acknowledged that proactive flood risk management is crucial and that it is specifically noted that Gatwick Airport is vulnerable to flooding hence flood management strategies in locations upstream of the airport must be robustly adopted. In addition where significant areas of soft surface have been removed or converted with hard standing this cumulatively can have a direct link to increasing flood risks elsewhere. GAL's view it is crucial that the draft SPD provides a detailed planning policy framework to reduce unacceptable direct and indirect risks of flooding due to new development. The implementation of SuDS overall is key to flood risk management and supported in principal by GAL. However promoters of certain forms of SuDS schemes need to consult with the airport to endure that the SuDS design promoted are not in conflict with the safe operation of the airport and the statutory aerodrome safeguarding requirements in place. GAL therefore strongly welcomes the inclusion of Section 10.11 within the Draft SPD. Gatwick Airport is an international interchange and a key transport hub which is of national importance to the UK. As such provision of readily accessible sustainable transport matrices are imperative to the functioning and sustainable footprint of the airport. GAL is continually aiming to strengthen and further enhance sustainable transport modal</td>
<td>the context of Policy ENV8 and national policy and guidance.</td>
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<td>Noted. No further change felt to be required.</td>
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<td>Noted. The issue of developer contributions and planning obligations will be covered in the council’s forthcoming Developer Contributions Guidance Note, and in</td>
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<td>choices for passengers travelling through the airport and also for the many employees working at the airport. GAL has legally binding and specific modal share targets for sustainable modes of transport which it continually aspires to achieve, improve and exceed year on year. GAL considers that it would add to Section 11 Sustainable Transport if there was the inclusion for the need for the consideration of planning agreements between developers and LPAs regarding implementing achievable and efficient public transport improvements as part of a development proposal (appropriate to the scale and viability of the development). This would then serve to capture the need to integrate sustainable forms of transport and improve connectivity with public transport networks as an early stage of the development design process. GAL believes the investment in new transport infrastructure and improving the efficiency and connectivity to existing networks must be a high priority for CBC and strongly promoted in Section 11 of the Draft SPD. Crawley has extensive rail and road connections to main transport arteries for example the A23, M23, M25 and Gatwick Rail Station, with the Gatwick Express to London and Brighton. GAL has committed significant investment into expanding and improving Gatwick Airport Rail Station and this will improve the frequency of rail service and the connectivity to key destinations to support the need for further sustainable transport enhancements and options. This exciting modern rail/airport interchange could also be utilised in the future (and within the lifetime of the Local Plan) by CBC to further raise sustainable transport options in the delivery of sustainable development, and in order to target greater public transport networks which could potentially be delivered alongside new development proposals.</td>
<td>the council’s Community Infrastructure Levy Charging Schedule and supporting documents (notably the Regulation 123 List). Paragraph 11.6 has been added to highlight the possibility of planning obligations being sought in relation to transport impacts, and to cross-refer to the guidance note, which will provide the most up-to-date guidance following the introduction of CIL.</td>
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<td>GAL</td>
<td></td>
<td>GAL fully supports the ambitions of the Crawley Borough Council SPD Planning and Climate Change. GAL has put forward constructive comments as part of the Consultation in order to feed into the development of an effective SPD. GAL will to continue to work alongside CBC to explore how we can further support the delivery of the SPD and facilitate in making Crawley an attractive place to study, visit, work and live.</td>
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| Environment Agency |               | **Flood Risk**  
It is useful to have the cross reference throughout the text of the document between Policies, so it is clear when an action can benefit more than one Policy. This is helpful to have connections between multiple benefits that can be derived through one action.  
The use of the colour coding for various types of development can be of some use to get the ‘at a glance’ reference.  
Revised climate change guidance was released in February 2016 and developers should be taking the most up to date guidance into account during the planning process. It would be useful to make reference to this within the Flood Risk Management section and to sign post where this latest information can be found;  
Noted.  
Noted. New footnote added to paragraph 10.5 highlighting the new guidance, with link also provided in ‘Further Reading’ section. |
<p>|                     | Page 9, Table 2.1 | The information contained within the table is useful, as it sets out the information in a visual and understandable manner. However, the title of the table could be more descriptive, currently it feels like the title is not very explanatory about what the table is actually showing. | Noted and amended. |</p>
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<td>Page 10, Table 2.2</td>
<td>Under Policy ENV8, the text within the ‘design stage requirements/recommendation’ box states ‘Consult EIA Flood Map for Planning’. Should this read ‘Consult EA Flood Map for Planning’?</td>
<td>Noted and corrected.</td>
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<td></td>
<td>Chapter 10, page 64</td>
<td>Text of Policy ENV8 contained within blue box. In point ii, after ‘Crawley Strategic Flood Risk Assessment’ could ‘SFRA’ be put into brackets please, as in point iii below the abbreviation SFRA is then used.</td>
<td>Noted, but text within the blue box is policy text from the Local Plan. An SPD cannot change policy text.</td>
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<td></td>
<td>Para 10.1, page 65</td>
<td>The second sentence in this paragraph is very long, it would read better if it could be divided up into shorter sentences.</td>
<td>Noted and amended.</td>
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<td></td>
<td>Paragraph 10.4, page 65</td>
<td>Within this paragraph, reference is made to both Table 2 and Table 3 from the PPG. Both of these tables include some very useful information and are helpful for reference. Has consideration been given to reproducing/including these Tables within the ENV8 section of the SPD? This would give an easy cross reference to these Tables and reiterate their content and the details they contain in a very topical place within the SPD.</td>
<td>Noted. This has been considered and on balance it was felt that while the tables are useful, there is a risk that with further verbatim reproduction of national guidance the distinctness and coherence of the SPD as a local guidance document will be diluted. In addition there is a risk of the SPD then being rendered out of date by amendments to the PPG.</td>
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<tr>
<td>Page 66, Table 10.1</td>
<td></td>
<td>The formatting of the title of the table would benefit from some tweaking. The title of the table states 'extracted from NPPF'. Should this read 'extracted from PPG' rather than NPPF? Also within the table title, at the end there a reference to 'Table 3.1, how does this relate to Table 10.1? Overall, Table 10.1 contains a lot of information but it does feel slightly confusing and is not that easy to read and understand what it is showing. Is there another way of depicting this information? Would colour coding help?</td>
<td>Noted. The table has been simplified. The requirements it is based on are in the NPPF (paras. 99-104). The confusing reference to ‘Table 3.1’ has been removed. It is hoped that the revised and simplified version of the table retains the information while being less confusing.</td>
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<td>Paragraph 10.7, page 66/67</td>
<td></td>
<td>Could ‘(i.e. 1 and potentially also 2)’ be changed to ‘(Flood Zone 1 and potentially also Flood Zone 2)’ please? At the end of this paragraph, after ‘Further guidance is provided in the PPG on ‘Flood Risk and Coastal Change’ and in Crawley SFRA’ could ‘(see links on ‘Further Information’ section below)’ be added?</td>
<td>Noted and amended.</td>
</tr>
<tr>
<td>Paragraph 10 – page 67</td>
<td></td>
<td>Same as second point for Paragraph 10.6, the addition of ‘(see links in ‘Further Information’ section below)’.</td>
<td>Since this is already at end of para. 10.6 it has not been thought necessary to repeat.</td>
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<td>Paragraph 10.9, page 67</td>
<td>Would it be helpful to add into the introductory paragraph on SuDS that Crawley is known to experience surface water flooding issues and sustainable drainage systems could therefore offer a real benefit to the area? The final bullet point on the page relates to the direct discharge of surface water runoff. The wording of the sentence suggests that discharge can be unregulated to watercourse, drain or sewer. Would it be useful to clarify that attenuation before discharge to a watercourse or piped system is likely to be required?</td>
<td>Noted. Text inserted into para. 10.9 to this effect.</td>
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<tr>
<td>Paragraph 10.10, page 68</td>
<td>Could ‘SuDS’ be added into the sentence ‘Where carefully designed and appropriately used, the features’ so it reads ‘Where carefully designed and appropriately used, the SuDS features’.</td>
<td>Noted and amended.</td>
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<td>Paragraph 10.13, page 68</td>
<td>After the reference to the DEFRA non-statutory technical standards for SuDS, at the end of that sentence would it be worth adding (see ‘Further Information’ section below) to demonstrate where this document can be accessed?</td>
<td>Noted and amended.</td>
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<td>Paragraph 10.16, page 69</td>
<td>This paragraph discusses work that should be avoided on or near watercourses and suggests the ‘Living on the Edge’ document for further guidance. It would also be prudent here just to remind the reader that certain types of work on or near watercourses would also require the prior permission of either the Environment Agency or the Lead Local</td>
<td>Noted. The text has been amended to make this clear.</td>
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Flood Authority and that developers/householders should always enquire of either Authority or CBC if they are unsure if prior permission will be needed.

Development specific guidance – Page 69
Within text box ‘CBC Recommends’ above paragraph 10.17, the word ‘annual’ is used when referring to volumes of surface water run-off. Would it be more prudent to remove the word ‘annual’ and just to state ‘volumes of surface water runoff’ instead?

Noted and amended.

Same comment as for 10.17 above.

Noted and amended.

Water Resources
These responses to the questions put are:
Q1,4,6,7,8,9. None identified
Q2. Are there any terms or concepts used in the policies or SPD text that require, or would benefit from, further explanation?

(i) A technicality, but Policy ENV6 applies to “non-residential extension(s), change of use or refurbishment affecting more than 100 sqm and comprising minor development” where Policy ENV9 does not. Policy ENV6 objective 6 addresses water stress (referring to Policy ENV9). Therefore there seems to be some vagueness as to what extent this category of development is expected to comply with BREEAM standards.

The BREEAM requirement within ENV9 is interpreted as referring to new non-residential buildings, rather than all non-residential development, as is explicit within the text of ENV9. This is clarified in paras. 8.7-8.8 of the SPD. The general requirement to consider water efficiency measures on the basis of ENV6 applies to all non-
(ii) It is not very clear to me what is referred to by the mention of water metering in bullet points (Main document p59, Guidance Note p6), as best practice for developers. Does this remark only refer to the BREEAM requirement for metering each individual non-residential building, in section 8.7? For domestic properties it would be possible also, as best practice, to suggest that all new flats be individually metered. Although metering of new properties, domestic and non-domestic, is required in any event under the Water Industry Act 1991, in London we are concerned that there is a trend for developers to install one meter for an entire block of flats. We are not sure to what extent this affects other areas. This reduces the incentive for occupiers in apartments to save water.

Q3. Are there any questions about the policy requirements, their interpretation, or their implementation as part of the planning process, which are not covered adequately, or at all, in the SPD?

(I) The top box on p11 (last) of the Guidance Note refers back to page 8 - should this be page 6? Page 56 of the main document asserts that the table referred to is an alternative to The Water Efficiency Calculator for new dwellings. The checklist doesn't seem to allow for the use of that instead.

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<td>(ii) It is not very clear to me what is referred to by the mention of water metering in bullet points (Main document p59, Guidance Note p6), as best practice for developers. Does this remark only refer to the BREEAM requirement for metering each individual non-residential building, in section 8.7? For domestic properties it would be possible also, as best practice, to suggest that all new flats be individually metered. Although metering of new properties, domestic and non-domestic, is required in any event under the Water Industry Act 1991, in London we are concerned that there is a trend for developers to install one meter for an entire block of flats. We are not sure to what extent this affects other areas. This reduces the incentive for occupiers in apartments to save water.</td>
<td>residential development. We feel that the policy text and guidance is consistent on this point.</td>
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<td>Q3. Are there any questions about the policy requirements, their interpretation, or their implementation as part of the planning process, which are not covered adequately, or at all, in the SPD?</td>
<td>Noted. The suggestion of water metering is made independently of the BREEAM requirement. Paragraph 8.9 of the SPD and p.6 of the Guidance Note have been amended to make it clear that best practice is to meter individual properties.</td>
</tr>
<tr>
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<td></td>
<td>(I) The top box on p11 (last) of the Guidance Note refers back to page 8 - should this be page 6? Page 56 of the main document asserts that the table referred to is an alternative to The Water Efficiency Calculator for new dwellings. The checklist doesn't seem to allow for the use of that instead.</td>
<td>Page reference issue noted and amended.</td>
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<td>The Water Efficiency Calculator is specifically for use on new dwellings, so cannot be used for alterations to existing buildings such as are the focus of the Guidance Note.</td>
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**CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT**

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<td>(ii) The checklist doesn't distinguish household from non-residential development and therefore misses the BREEAM requirements for the latter.</td>
<td>The BREEAM requirements are not interpreted as referring to alterations to existing buildings, so are not considered relevant to the Guidance Note.</td>
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<td><strong>Q5. How can the SPD further help to mitigate the difficulties which applicants might encounter when addressing the policy requirements?</strong></td>
<td>Noted. The text now makes this clear.</td>
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<td>Presumably the document deliberately avoids mentioning the redundant Code for Sustainable Homes, but it might help an applicant to know that the 110 litres/person/day standard (which includes external use) is equivalent to the old CfSH level 3 of 105 litres/person/day internal use.</td>
<td>A number of cross-references to the GI SPD are included; at the same time the intention is to keep the focus on flood risk/water efficiency and not to extend the document unnecessarily with information repeated elsewhere. Amendment made to para 10.10 to highlight benefit of SuDS to River Basin Plan objectives.</td>
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<td><strong>Biodiversity</strong></td>
<td>In terms of pursuing broader goals of the Water Framework Directive &amp; River Basin District Plans, this is considered better located in the Green Infrastructure SPD. Cross reference added to para. 10.16.</td>
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<td>The Planning and Climate Change SPD would benefit from providing more links to green infrastructure documents.</td>
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<td>To ensure that development, including energy generation, positively contributes to the Water Framework Directive, and it's clear that the use of SuDS, and appropriately buffering watercourses from development, contributes to the River Basin Plan.</td>
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<td>If these issues are adequately covered in green infrastructure documents, they should be cross referenced within your document.</td>
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Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water’s appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.

As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water:

10. ENV8: Flood Risk Management

Flood Risk
The NPPF states at paragraph 100 that a sequential approach should be used by local planning authorities to avoid inappropriate development in areas at risk of flooding. The NPPG sets out that this applies in areas to be at risk from forms of flooding other than from river and sea including from ‘overwhelmed sewers and drainage systems’.

Any flood risk policy should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.

Sustainable Drainage
Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role.

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<td>Thames Water</td>
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<td>Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water’s appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water. As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water: 10. ENV8: Flood Risk Management Flood Risk The NPPF states at paragraph 100 that a sequential approach should be used by local planning authorities to avoid inappropriate development in areas at risk of flooding. The NPPG sets out that this applies in areas to be at risk from forms of flooding other than from river and sea including from ‘overwhelmed sewers and drainage systems’. Any flood risk policy should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. Sustainable Drainage Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role.</td>
<td>Noted. The policy text itself cannot be changed by the SPD, but the guidance text (like the Crawley Strategic Flood Risk Assessment) acknowledge the risk of flooding from surface water, sewers and other non-fluvial sources.</td>
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<td>Noted. It is felt that the current guidance approach regarding policy ENV8 gives proportionate weight to the importance of SuDS and to their additional advantages. No further change felt to be required.</td>
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<td>in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: • improve water quality • provide opportunities for water efficiency • provide enhanced landscape and visual features • support wildlife • and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Masterplan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</td>
<td>Added as para. 10.16.</td>
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|            |               | **Conserving Water**  
Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327). Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. | Noted. No further action felt to be required.                                                              |
<p>|            |               |                                                                                                                                                                                                          | Link to Thames Water ‘Saving water’ web page added in ‘Further Information’ section                      |</p>
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<td>West Sussex County Council</td>
<td>Policy ENV8</td>
<td>We would recommend one minor wording change (in red type below): Policy ENV8: Development and Flood Risk ii. refer to the Environment Agency Flood Map for Planning, Risk of Flooding from Surface Water Map and Crawley Strategic Flood Risk Assessment to identify whether the development location is situated in an area identified as being at risk of flooding;</td>
<td>Comment noted, but unfortunately this is policy text which cannot be changed by an SPD. Guidance has been included to this effect in the SPD.</td>
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<td>Dr Bill Temple-Pediani</td>
<td></td>
<td>You may find it helpful to read what my company conveyed to Decc concerning the proposed development of EbbCHP to serve 16,000 new properties in Ebbsfleet Garden City. Indeed, we have followed up with further proposal to create the Ebbsfleet Centre for Climate Change Excellence. The scope and scale of CHP scheme serving Horsham and Crawley is the same. Called GatCHP, its location is immediately east of Faygate adjacent to the rail line. From there the primary district heating main intends to run into the heart of Crawley town. We would pick up Kilnwood Vale and West of Ifield as up to 5,000 new homes meriting low carbon electricity and heat. The approach to Decc concerns s.38 of Infrastructure Act 2015 by which the Secretary of State proposes GatCHP should be owned by those residents and businesses receiving the energy it will generate. We are pioneering the approach in Ebbsfleet and intend the same in Basildon. For whatever reason, officials in West Sussex have been unable to grasp the concept albeit if you add the new homes planned by Horsham District Council we appear to have a catchment in excess of 20,000 new dwellings plus business park and university campus. (Enc: MoU - Decc)</td>
<td>Local Plan Policy ENV7 encourages the development of district energy networks and associated infrastructure unless it results in significant adverse impacts on the environs. The council’s approach to such proposals will be on this basis. Since the local circumstances and impacts of such schemes are likely to be highly specific it is difficult to expand the guidance on this point. More generally this response seems to deal with matters falling outside the scope of the SPD, since it relates to land outside of Crawley, and also in part to the ownership of community energy schemes, which is not a planning consideration. No further action felt to be required.</td>
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<td>Colin Maughan</td>
<td>Guidance Note: Page 3</td>
<td><strong>Energy and Water Efficiency for Alterations and Extensions to Buildings</strong> Unfortunately, owners of older houses with cavity walls are still being encouraged to increase the insulation by having these cavities filled. Unless the masonry is exceptionally impermeable to rainwater, this insulation material is likely to become waterlogged, and in the worst cases – as where I live in Shrublands, Furnace Green – water running down the interior walls during and after heavy rain results. Water proofing the exterior walls, fails, so PVC weatherboards seem to be the only solution. In some cases the insulation has been removed, at great expense. Interior insulation is initially more expensive, but the only solution. From what I have been told, energy metering has sometimes resulted in much higher bills, presumably as a result in the equipment being new and untried.</td>
<td>It is recognised that these kinds of issues are of importance to householders and others to whom the Guidance Note is addressed, but it is not felt that it is not the place of the document to comment at this level of detail. These concerns do, however, relate to the issue of consumer protection and consumer standards, and an additional section on this issue has been added to the document.</td>
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<td>Guidance Note: Page 5</td>
<td><strong>Solar Panels.</strong> I haven’t heard much about solar panels, except to avoid allowing builders to choose them. Vast numbers of unsatisfactory Chinese panels are being dumped here, and bought by builders for knockdown prices. So far, I have not come across guidelines for fixing solar panels to existing roofs, a) this could cause damage, and b) if a roof needs to repaired, the solar panels will need to be removed with great care. Freestanding panels are probably more satisfactory.</td>
<td>Again it is not felt that it is the place of the Guidance Note to provide detailed commentary of this kind: its main function is to highlight different possible approaches to environmental sustainability in the context of building alterations. See above, however, as regards consumer protection.</td>
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<td>Guidance Note: Page 6</td>
<td><strong>Airtightness.</strong> A balance needs to be struck between energy conservation and ventilation. Undue airtightness is likely to be a hazard to the house</td>
<td>This is a complex technical issue which again it is not felt appropriate</td>
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<td>occupants. This is a job for someone who understands how this balance is achieved and monitored. Trees and shade. This also is a balance, partly a case of choosing the appropriate types of trees. Willows for instance are attracted to water, and completely block water drainage systems. My neighbours with a swimming pool complain about the shade my tree casts over their garden. The neighbours on the other side complain that my bamboo sound barrier scratches their cars, if they drive close to it.</td>
<td>to give detailed coverage of in the guidance note. Noted. The Green Infrastructure SPD provides guidance on the different factors to be taken into account when works affecting or involving trees are proposed.</td>
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<td>SPD</td>
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<td>Planning and Climate Change Supplementary Planning Document Replacement doors and windows. I couldn’t find a relevant reference to this, but I have always worried about the widespread use of PVC, which is damaging to the environment. Also, I should like to see sustainable materials, like timber, being used much more in building construction. Low maintenance is not always the best reason for specifying materials, and neither is initial low cost. Painting provides work. Clear storey windows. Although they may not be mentioned in this report, I would recommend their use on top floors of most buildings, especially housing, as they provide daylight lighting conditions and, provided they can easily be opened and closed, a dramatically effective cooling effect in very hot summers. The disadvantage is that they probably need to be closed when it rains, and also the roof detailing surrounding them externally needs also to be well constructed or the roofs leak in stormy weather like the present.</td>
<td>Noted. The SPD (chapter 5) provides general guidance on considering the environmental impact of construction materials chosen.</td>
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<td>General SPD Comment</td>
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<td>In such important, complex documents it would be helpful in the short run, and probably even more so in the long run, if there was a good index. I realise Crawley Borough is only a publisher in a modest way, and indexing is a profession in itself. I expect it delays publication and it is</td>
<td>Noted, but this is a time-consuming exercise and the advantages therefore need to be weighed against other possible</td>
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<td>Respondent</td>
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<td>probably very expensive, but the successful implementation of the policies relies on being able to find the relevant parts fairly easily, and again.</td>
<td>improvements to the guidance. In general the approach is to try to provide adequate signposting by means of contents, visual aids, and clear formatting.</td>
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<td>Similarly, in a way, it is important to research pictorial examples in such reports very thoroughly. When you think of how very carefully the wording in the report has been edited the pictorial matter is much more hit or miss. I am thinking especially of the examples I mentioned in my comments on “Urban Design” pages 8 and 36. Examples in pictorial guidelines need to be very good examples – almost caricatures – and if in doubt backed up by their own captions, as well as figure numbers.</td>
<td>Noted. No further change felt to be required to Planning &amp; Climate Change SPD.</td>
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<td>General SPD comment</td>
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<td>Would it be too late to number all these publications? As some of them have long, complex titles, it might make using them a little easier, a similar rationalisation to the idea of an index perhaps?</td>
<td>Noted. But on balance it is considered simpler not to number them, particularly given that there is a difference in status – i.e. SPDs/Guidance Notes. Also the adopted Manor Royal Design Guide SPD is not numbered.</td>
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<td>General SPD Comment</td>
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<td>The typing style of the texts incorporates the ancient American Pitman practice of using two word spaces after full points (stops). This isn’t necessary and visually it leaves white holes in a page of text.</td>
<td>Noted. Matters of style will be kept under review.</td>
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<td>General SPD Comment</td>
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<td>In structuring your content it is usually unnecessary to use more than one form of emphasis. Thank goodness “all capitals” hasn’t been used much. URBAN DESIGN and PLANNING AND CLIMATE CHANGE. Only use “&amp;” on trade names, like G&amp;T incidentally. So avoid using large and bold</td>
<td>Noted. Matters of style will be kept under review.</td>
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<td>type. Don’t underline type it is an annoying aberration introduced with computers.</td>
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<td>Text lines containing more than 60 characters are difficult to read and best avoided.</td>
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<td>Setting with close word spacing and left looks better on the page than justified type, which has variations in word spacing. Don’t justify short measures – huge word spaces appear.</td>
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<td>Letter spacing should be closer the larger the type – you have over large, bold type with wide letter spacing, and as a result, the words fall apart visually.</td>
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<td>Too many capitalised words are used in headings and sub-headings. The rule is “if in doubt use lowercase”.</td>
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<td>Where boxes are used, avoid coloured or grey backgrounds – this is using two methods of emphasis instead of one. Even better avoid using line boxes and use grey or coloured backgrounds instead.</td>
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<td>Sometimes tabular work with horizontal rules looks better than boxes (enc. example sketch).</td>
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<td>For the sake of clarity, and visual interest on the page, make pictures larger – without the cut-outs for figure numbers and captions. Make them as large as picture quality and their relative importance in the content justifies (enc. example sketch).</td>
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<td>Try to specify a hierarchy of type sizes and weights from titles, chapter headings, subheadings and shoulder headings to figure numbers and captions to footnotes. Avoid too large jumps and extremes in sizes of type.</td>
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<td>When using pictures as illustrations, as well as making them larger, and therefore more interesting, adjust the perspective on your computers to that buildings/architectural verticals are correct. It looks better on the page and less amateur. Sometimes, more than one good example is better than a single out. Pictures of bad practice are sometimes difficult to use, unless they have their own explanatory captions. Or the good and bad are obvious (enc. example sketch).</td>
<td>Council's Response</td>
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