

**CRAWLEY BOROUGH COUNCIL**  
**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**  
**REGULATION 12 CONSULTATION STATEMENT**

**OCTOBER 2016**

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**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<sup>1</sup>, highlighting the fact that the council proposed to produce a group of SPDs across a range of identified topics, including the town centre. 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 Town Centre SPD. No

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<sup>1</sup> See Appendix A for details of the materials used as part of the general Early Engagement consultation.

responses were received in relation to the Town Centre SPD regarding the nine broad questions mentioned above.

- 2.4. On 20 January 2016, a seminar was held for all council members at which the proposed focus and approach of each SPD currently being worked on was summarised, and questions and comments were invited. Issues of particular interest to the Town Centre SPD focused on the need to promote an active and healthy town centre, supporting the efficient use of buildings and space, and helping the town to adapt to the challenges presented by out-of-centre retailers. These were taken into account in preparing the consultation draft SPD.
- 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. Development Management raised a number of points, emphasising that guidance should be clear and usable to ensure that planning applications are supported by relevant information and that developers are aware of the policy expectations. The SPD was also amended in response to feedback from Property to clarify points raised in the site specific design guidance section, and provided further focus on skills development following input from Economic Development. Environmental Health provided guidance which was factored into the consultation draft SPD.

### **3. Consult: Stage 2 - Publication**

- 3.1. A formal stage of public consultation was undertaken on a draft version of the Town Centre SPD. The draft document was available for representations over a four week period between 27 June 2016 and 25 July 2016. 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. 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. An additional period of targeted liaison was also undertaken with site owners and representatives in the period leading up to the Council's Cabinet on 5 October 2016.
- 3.3. During the consultation period, the draft Town Centre 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
- 3.4. The consultation draft SPD included a number of specific questions to aid the consultation process. These were set out within the document, both throughout the text and together at the end of the document for reference. They are replicated in Appendix B(1) of this consultation statement. Responses did not have to be restricted to answering the questions and comments were welcomed on any part or aspect of the draft SPD.

### Representations Received

- 3.5. 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 response 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**

### **a) 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.

**b) EARLY ENGAGEMENT EMAIL TO LOCAL PLAN CONSULTEE  
DATABASE**

# LOCAL PLAN UPDATE

2 October 2016



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](http://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](http://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](mailto: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](mailto:forward.plans@ Crawley.gov.uk)

## c) EARLY ENGAGEMENT LETTER TO LOCAL PLAN CONSULTEE DATABASE

### Strategic Housing & Planning Services

Contact: Elizabeth Brigden

Date: 09/10/2015

Direct Line: 01293 438624

Email: [Forward.Plans@crawley.gov.uk](mailto:Forward.Plans@crawley.gov.uk)



Lee Harris  
Chief Executive Directorate

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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If you are interested in being kept informed in any of the above topics, please could you contact the Forward Planning team by email at [Forward.Plans@crawley.gov.uk](mailto:Forward.Plans@crawley.gov.uk) or phone 01293 438624 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.

Yours Faithfully,

A handwritten signature in black ink, appearing to read "Elizabeth Brigden".

Elizabeth Brigden  
Planning Policy Manager

## d) 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  
Darlton Warner Davis LLP  
Deloitte LLP  
Deloittes  
Development Planning & Design Services Ltd  
Diego Garcian Society  
Divas Dance Club  
DMH Stallard LLP  
Drivers Jonas Deloitte  
DTZ  
East Sussex County Council  
Eastern Stream  
Elim Church Crawley  
Equality & Human Rights Commission  
Firstplan  
Forestfield & Shrublands Cons. Area Adv Cttee  
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-Jafferyyah (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

Planware Ltd.  
 Play England  
 Premier Planning Plc  
 Rapleys LLP  
 RenewableUK  
 RISE  
 Royal Mail Properties  
 RPS Group  
 Rusper Parish Council  
 Savills  
 SEBA South East Bangladeshi Association  
 Seva Trust  
 Shelter Housing Aid Centre  
 Shire Consulting  
 Sikh Community Centre Crawley & CPT  
 SIVA  
 Slaugham Parish Council  
 Soka Gakkai International – UK  
 Southern Counties  
 Southgate Conservation Area Committee  
 Sport England  
 Spurgeons  
 Sri Guru Singh Sabha  
 Sri Lanka Think Tank UK  
 Sri Lankan Muslim Welfare Association  
 St Margaret's C of E Primary School  
 Stanhope PLC  
 Stiles Harold Williams Partnership LLP  
 Strutt and Parker  
 Sussex Action Traveller Group (STAG)  
 Sussex Traveller Action Group  
 Sussex Wildlife Trust  
 Sustrans  
 Swadhyay Community Project (SCP)  
 Talk Bewbush  
 Taylor Wimpey  
 Thakeham Homes Ltd  
 Thales UK  
 The Clearwater Gypsies  
 The Gypsy Council  
 The McLaren Clark Group  
 The Miller Group  
 The Palace Street Group  
 The SIVA Trust  
 The Theatres Trust  
 The Vine Christian Fellowship  
 Three Bridges Forum  
 Three Bridges Free Church  
 Tinsley Lane Residents Association  
 TRY (Plus Chair of Black History Foundation &  
 other orgs)  
 United Reformed Church  
 Vision in Youth Collective  
 West and Partners  
 West Sussex Access Forum  
 West Sussex Children and Family Centres  
 West Sussex Crossroads  
 West Sussex Youth Support and Development  
 Service  
 Woodland Trust  
 Worth Conservation Area Group  
 Worth Parish Council  
 WRVS  
 WS Planning & Architecture  
 WYG Group  
 Metrobus

Reside Developments Ltd.  
 Savills  
 Land Planning & Development  
 DevPlan  
 JWL Associates Limited  
 HCA  
 Deloitte  
 Arora International  
 Development Securities  
 Moat Telford Place  
 Crawley Clinical Commissioning Group  
 Adur & Worthing  
 Brighton & Hove City Council  
 British Telecom  
 BT Plc  
 Chichester District Council  
 Coast to Capital LEP  
 Epsom & Ewell Borough Council  
 English Heritage  
 Environment Agency  
 Highways England  
 Homes and Communities Agency  
 Horsham District Council  
 Lewes District Council  
 Marine Management Organisation  
 Mid Sussex District Council  
 Mole Valley District Council  
 National Grid  
 Natural England  
 Network Rail  
 NHS Sussex  
 Reigate and Banstead Borough Council  
 South Downs National Park  
 Southern Gas Network  
 Southern Water  
 South East Water  
 Surrey County Council  
 Sussex Police  
 Tandridge District Council  
 Thames Water  
 The Coal Authority  
 UK Power Networks  
 Waverley District Council  
 West Sussex County Council  
 Worthing Borough Council  
 West Sussex County Council  
 West Sussex Fire and Rescue Service  
 Guildford District Council  
 National Landlords Association  
 Sport England  
 Travis Perkins  
 Deloitte  
 Dev Plan UK  
 DPDS Planning  
 Indigo Planning  
 AMEC Foster Wheeler  
 WYG Planning  
 WYG Planning  
 Holiday Extras  
 Sussex Wildlife Trust  
 Sussex Gardens Trust  
 Historic England  
 Quod Mayfield Market  
 Tetlow King  
 Gatwick Area Conservation Campaign  
 Stratus Environmental

Zoe Elphick  
Miss Z Read  
Yvonne Lindsay  
Sean  
Yvonne Shaw  
Yeshwant Patel  
Yasmin Church  
Y Bosseva  
Rosa Pereira  
Miss R Nieman  
Wendy Bell  
Wendy Whittington  
W Chorley  
Stephen Hayes  
Wendy Plaistow  
Mr & Mrs Bennett  
Z Wilson  
Brian Wilkinson  
Paul West  
Michael-Thor Bateman  
Wesley Brazier  
Wes Botting  
Mrs WJ Paton  
W Lovell  
Ann Pile  
Vivienne Dawson  
Vishal Mathur  
Vikki-Jade Peters  
Vidita Shah  
Victoria Martin  
Vicky Langham  
Victoria Beach  
Vicki Wallage  
Vicki Mills  
Vicky Nixon  
Vicki Clare  
Verity Eunson-Hickey  
Paul Owen  
Veronika Novotna  
Verity Colbert  
Katie Vella  
Iryna Varvanina  
Mr Vaidya  
Mr R S Upton  
Patricia Upham-Hill  
Charles Jones  
T Pawlak  
M Wright  
Miss Tracy Poynter  
Tracey Gillett  
Tracy Jones  
Tracy Clarke  
Tracey Wesson  
Tracey Leicester  
Tracey Coleman  
Tony Sutton  
Tony Fullwood  
Toni Smith  
Thomas James Whittington  
Tom Familton  
Thomas Carney  
Tom Woolner  
Natalie Tippett  
Tina Wort  
Tina Thrift  
Tina Patel  
Priscilla Lambert

Emma Thrift  
Coral Thompson  
Thomas Peckham  
Tom Pashley  
Morgan O'Flanagan  
Clare Loader  
M B Lanham  
Mrs Jenny Lakeman  
Roy Howard  
Lynn Howard  
Karen Tankard-Fuller  
Timothy Caig  
Amanda Whale  
Kim Gordon  
Mrs Teresa Perrott  
Terry Beavis  
Mr Terry Wheller  
Jake Hawkins  
Chay Sharp  
David Sharp  
Ellice Sharp  
Patricia Sharp  
Tom Doyle  
Terry Stanley  
Tracey Bennett  
Tara Petty  
Tanya Bunn  
Tanya Sladovich  
Tadeusz Jasko  
T Pool  
Tracey Cox  
Sylvia Handy  
Angela Heath  
Mrs Siyar  
Suzanne Davies  
Mrs S Knight  
Suzannah Guy  
Susan Lester  
Susan Smyth  
Sue Carraher  
Sue Arnold  
Sunita Singal  
Sumra Ahmed  
Sumi Patel  
Sue Mason  
Miss Susan King  
Sue Janota  
Natacha Wilson  
Karla Strudwick  
Sarah Dowdall  
Sandra Foxton  
Stewart Neate  
Stevin  
Mr Steven Soper  
Steve Taylor  
Stephen Rivers  
Stephanie Cox  
Stella Daff  
Dtella Makey  
Staum Parrett  
Charis Atkinson  
Stacy Malin  
Sharon Spice  
Stacey Rose  
Nina Spence  
Sophie Davies  
Sophie Airey

Sophie Harding  
Colin Snook  
Dawn O'Dwyer  
Sophie Eaton  
Sam Bouglas  
Sharon Richardson  
Sarah-Jane Willis  
Siobhan Miller  
Claire Collins  
Doreen Simpson  
Simon Thrift  
Joan Thrift  
Simon Freeman  
Simon Douglas  
Simon Randall  
Simon Hickey  
Simon Burrows  
Simon Biffen  
Sim Sidhu  
S.Newbury  
Sherwin Scott  
Michelle Holmes  
Darren Williams  
Shelley Williams  
Malcolm Woodhead  
Sheila Woodhead  
Shazia Ahmed  
Shazia Sidat  
Gwen Poyton  
Sharon Ottley  
Shayne Fensom  
G V Sharp  
Sharon Terry  
Leandro Correa  
Sharon Correa  
Sharon Brumwell  
Sharon Vygus  
Mrs S Veaney  
Sharon Harris  
Ms L Flay  
Mrs Harrington  
Alison Shackell  
S. Garvin  
Serene Cottee  
Mrs S E Cooke  
Sean Reynolds  
Steven Woods  
Zoe Grimshaw  
Amanda Bounds  
Samuel Beach  
Andy Marriott  
Mrs Sarita Arya  
Mrs. Renata Hegedusne  
Sarik  
Sarah Piper  
Miss Sarah Carter  
Sarah Newman  
Sarah Lee-Fisher  
Sarah Greenwood  
Sarah Parker  
Sara Ahmed  
Sara Doyle  
Martin Santaniello  
Sandra Mehmet  
Sam Judge  
Sam Bateman  
Samantha Haines

Sam Cook	Mr Burgess	Nick Wilkinson
Clare Salvage	Mrs Burgess	Rachael Wilkinson
Karen Salter	Rudi Bird	Shaun Wilkinson
Sally Croft	Christopher Vincent Gartlan	Neena Seeruthun
Sally Thorn	Katerina Radova	Andrew Towner
Sally Osmond	Radhika	Martin Bates
Sally Sanders	Rachel Price	Mrs Kim Nobbs
Mrs Sabeen Mansoor	Rachel Pamment	Nadine Terry
Sarah Keen	Georgina	Anita Bateman
Mr Ryan Tate	Mr P Wakeham	Niraj Patel
Ryan Page	Mrs I Wakeham	Nick Cornwell
Ryan Jenkinson	Lisa Wilson	Nick Edwards
Bob Woods	Claire Burrage	Nicole Sullivan
Russell Milton	Paul Thomas	Niall Kelly
Russell Sharp	Samantha Thomas	Niall Nugent
Russ Mitchell	Sir / Madam	Johnny Da Silva
Rukiya Maxwell	Jenny Willis	Netta Bond
Pamela Ruel	Paul White	Vanessa Marriott
Reniece Robinson	Sir / Madam	Neil Slugocki
Richard Page	Adelaide Jenkins	Neil Donald
Daniel Stannard	Kerry Dawson	Natalie Bingham
Josie Stannard	Cristian Pierri	Julie Roberts
Libby Stannard	Karen Lewis	Neil Smith
Roy Stannard	Tyler Pierrri	Natalie Saunders-Neate
Kay Stannard	Philippa Mitchell	Mr Nathan Spriggs
Ross Margetts	Rex Upham-Hill	Natalie Chambers
Rosie Cavedaschi	Petty West	Natalie Zevka
Ros February	Graham Petschel	Mrs Natalie Moran
Rosemary Cogdon	Peter Willis	Natalie Sullivan
Rosemarie Jerome	Peter Brooks	Naomi Wiggins
Rosemary Benwell	Peter Beckley	Nancy Weltner
Rory Church	Pete Lyons	Najiya Slimani
Ronnie Armstrong	Peter Griffiths	M. Lashmar
Rohan Patel	George Penfold	Mr Michael Whiting
Rod Horton	Mr. & Mrs. G. Harwood	Maeve Weller
Robert Rolfe	Jean Goodrich	Laura Randall
Robert MacPherson	Joanne Brown	Terry
Roberta Page	Peter Burrows	Moustapha Kada
Robert Bruins	Mary Burrows	Mrs Janette Thompson
Robert Bird	Emily Johnson	Linda Keynes
Robin Vallins	Paul Oliver	Wayne Bonner
Yvonne Vallins	Paul Brown	Kara Bonner
Rob Pullinger	Pauline February	Amanda Madel
Thomas Pullinger	Paul Hughes	Harry Madel
Vicky Pullinger	Paul Davis	Trevor Madel
Robert Paliotta	Paul Berry	Samantha Wood
Rik February	Paul Miller	Mrs Sue Bristow
Richard Thorburn	Paula Hanslow	Margaret San Juan Martin
Richard Symonds	Paul Roberts	Shani Wheatley
Richard Nixon	Paul Harrison	Molly Rumble
Rhys Whittle	Patricia Patel	Morag Warrack
Rhonda Dann	V Patel	Mohsin Ahmed
Sophie Warren	Mrs P Godwin	Mr M Richardson
Benson Kalubi	Alexander Curtis	Mr Martin Saunders
Rhoda James	Pat Crees	Jonathan Mitchell
Rachel Hillman	Simon Pashley	Paul Lewis
Reuben Peters	Nick Pashley	Michael Petryszn
Aurora Lula	Mr P Akhtar	Mike Parker
Remo Lula	Parmjit Sidhu	Michael Eaton
Aaron Squirrell	Peter Parker	Michael Simmonds
Maretta Rees	Pam James	Mike Doyle
Reece Church	Sarah Page	Maria Lula-Harris
Mr Reece Tate	Julie Daly	Michael Schultz
Kelly Byworth	Patricia Burrett	Michelle Collins
Stephen Leake	Nick Price	Michele Singleton
Rebecca Betteridge	Christopher Wilkinson	Mike Jones
Rebecca Holt	Mandy Wilkinson	Pat Eldridge

Michelle Taylor  
Melissa Gomes  
Mel Ansell  
Marion Auffret  
Cheryl Higgins  
Joanna Dyckes  
W.M. Deacon  
Michael Clive Latin  
Deborah Burbidge  
Mrs Maxine Soper  
Maurice Frost  
Nathan Frost  
Maureen Foster  
Matt Leese  
Matthew King  
Matthew Butler  
Matt Calver  
Matthew Allen  
Matthew White  
Matt Coleman  
Stacey Barker  
Stuart Mason  
Mary Gasson  
Martyn Moore  
Martin Huxter  
Greg Upcott  
Kinsley Upcott  
Lola Upcott  
Martine Channell  
Martin Harbor  
Mr A Marriott  
Mrs K Marriott  
Mark Hynes  
Mark Lawford  
Sir / Madam  
Mark Brown  
Mark Amos  
Mr M Nieman  
Mark Butcher  
Marilyn Stockbridge  
Mary Scott  
Victoria Arnold  
Sarah Seager  
Mr Williams  
Amanda Mustafaj  
Mark McKown  
Malcolm Woodhead  
Malcolm Millard  
Mala Patel  
Maja Jasko  
Margaret Florey  
Mohammad Badshah  
Lynsey Woods  
Lynn Lowe  
Mrs Lynda Morgan  
Lee Warner  
Luke Grima  
Lucy Downie  
Lucy Vella  
Linda Taylor  
Logan Peers  
Lauren Parisi  
Louise Waugh  
Louise Weekes  
Louise Brooks  
Louise Golding  
L Haynes

Lisa Burton  
Charlotte Cox  
Lauren O'Sullivan  
Lorraine Pateman  
Lorraine Graham  
Susan Johnson  
David Thrift  
Lois Thrift  
Sir / Madam  
Mr Lee Whiting  
Mr D Hill  
Gordon Mitchell  
Carina Higson  
Jackie Littleton  
Lisa Tomkinson  
Lisa Powell  
Kara-Leigh April Harrison  
Lisa Curcher  
Lisa Brown  
Joan Hoys  
Emma Challis  
Ian Johnson  
Shirley Bettinson  
Lisa Bettinson  
Linda Dabboussi  
Mrs L Burchett-Vass  
Master Liam Spriggs  
Lewis Holman  
Lesley King  
Lesley Jacobs  
Susan Bevis  
Miles Carroll  
Julia Hayes  
Len Hayes  
Lee Sellers  
Lee Kabza  
Rhys Carney  
Jimi Carney  
Lee Carney  
Leanne Sim  
Kyle Sim  
Olivia Lindsey  
Lewi Lindsey  
Leeanne Jones  
Mrs Stevens  
Sir / Madam  
Lauren Judge  
Laura Virgo  
Laura Fraser  
Laura Irvine  
Laura Marden  
Laura Hamilton  
Ms Charlotte Latimer  
Pauline  
Alena Hobson  
Donna Botting  
Jayden van de Lagemaat-  
Bettinson  
Andre van de Lagemaat  
P Wheeler  
Kyle Fish  
Jakub Jasko  
Kate Townner  
Karen & Phil Smith  
Phil Smith  
Kim Piercey  
Peet Boxall

Kate Nulty  
Joyce McGinty  
Kevin McGinty  
Karla Thompson  
Kathryn Pashley  
Krystal-Ann Peters  
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### 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: Crawley 2030.

#### 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:

- 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 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.

## In This Section:

- [Planning and Development](#)
- [Planning Policy](#)
- [Local Plan - Crawley 2030](#)
- [Crawley 2030: Supplementary Planning Documents](#)

## Contact Us

**tel:** (01293) 438512  
**fax:** (01293) 438495  
**email:** [click to contact us](#)  
**address:**  
 Strategic Planning  
 Town Hall  
 The Boulevard  
 Crawley  
 W.Sussex RH10 1UZ



#### 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 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 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 this, 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 (2016).

## **APPENDIX B: STATUTORY CONSULTATION MATERIALS**

### **1. TOWN CENTRE SPD CONSULTATION QUESTIONS**

#### **Policy Specific Questions:**

**Question 1: Supporting Sustainable Economic Growth in the Town Centre**

*Are there other ways in which economic development can contribute positively to the economic character of Crawley Town Centre?*

**Question 2: Controlling the Loss of Employment Floorspace in the Town Centre**

*Does the Town Centre SPD strike an appropriate balance between planning for Main Town Centre uses such as commercial, leisure and retail and supporting the delivery of residential development?*

**Question 3: Ground Floor Changes of Use in the Primary Shopping Area**

*a.) Does the Town Centre SPD provide enough guidance to explain when an economic statement is required and the type of information that is needed?*

*b.) Are there any other ways in which proposals can show how they would support the vitality and viability of the town centre which can be referred to in the guidance?*

**Question 4: Upper Floor Change of Use in the Primary Shopping Area to Main Town Centre Uses or Community Uses**

*Does the policy set out appropriate criteria to ensure that upper floor development for main town centre uses contribute positively to the town centre?*

**Question 5: Upper Floor Change of Use in the Primary Shopping Area to Residential Uses**

*a.) Does the policy set out appropriate criteria to ensure that upper floor residential development contributes positively to the town centre?*

*b.) Are there other measures that can help to manage the relationship between commercial and residential uses in the Town Centre?*

**Question 6: General Development Principles for Town Centre sites**

*Do you have any comments on the general development principles for town centre sites?*

**Question 7: Development Guidance and Principles for Sites within the Town Centre Boundary**

*Do you have any feedback on the suggested development guidance and principles for these sites?*

**Question 8: Retail and Leisure Development outside the Primary Shopping Area**

- a.) *Does the Town Centre SPD provide sufficient clarity as to how town centre, edge-of-centre and out-of-centre locations are defined?*
- b.) *Are there other factors that should be considered in the application of the sequential test?*
- c.) *Are there other factors that should be considered in the application of the impact test?*

**Question 9: Town Centre Skills Academy**

*Does the SPD provide sufficient guidance on how developers can participate in the Town Centre Skills Academy?*

**Question 10: Engagement**

*Have we identified the key stakeholder groups that have an interest in the future planning of the town centre? Are there any stakeholders missing?*

**General Questions:**

**Question 11:** Are there any ways in which the SPD could be made easier to use and navigate?

**Question 12:** Are there any terms or concepts used in the SPD that require, or would benefit from, further explanation?

**Question 13:** 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?

**Question 14:** Is there further information not provided in the SPD which is likely to help applicants to meet the policy requirements?

**Question 15:** How can the SPD further help to mitigate the difficulties which applicants might encounter when addressing the policy requirements?

**Question 16:** Are there further examples of best practice in terms of sustainable town centre development that it would be appropriate to highlight in the SPD?

## 2. EMAIL NOTIFICATION OF COMMENCEMENT OF FORMAL PUBLIC CONSULTATION TO CONSULTEE DATABASE

# LOCAL PLAN UPDATE

27 June 2016 20 September 2016



Dear,

### TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT: 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 Document:

- Town Centre

This document has 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 document is available to view on the council's website: [www.crawley.gov.uk/crawley2030spd](http://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 27 June and 25 July 2016. All responses must be made in writing, by **5pm 25 July 2016**, and can be submitted either by email to [forward.plans@crawley.gov.uk](mailto: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 the Town Centre planning 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](mailto: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](http://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](mailto:forward.plans@ Crawley.gov.uk) or you can phone us on 01293 428624.

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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](mailto:forward.plans@ Crawley.gov.uk)

### 3. LETTER NOTIFICATION OF COMMENCEMENT OF FORMAL PUBLIC CONSULTATION TO CONSULTEE DATABASE

#### Strategic Housing & Planning Services

Contact: Elizabeth Brigden

Date: 27/06/2016

Direct Line: 01293 438624

Email: [Forward.Plans@ Crawley.gov.uk](mailto:Forward.Plans@ Crawley.gov.uk)



Lee Harris  
Chief Executive Directorate

Dear Sir or Madam,

#### SUPPLEMENTARY PLANNING DOCUMENT: 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 Document:

- Town Centre.

This document has 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.

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Yours Faithfully,

A handwritten signature in black ink, appearing to read 'E Brigden'.

Elizabeth Brigden  
Planning Policy Manager

#### 4. EMAIL REMINDER TO CONSULTEE DATABASE

# LOCAL PLAN UPDATE

18 July 2016



Dear,

## TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT REMINDER: CONSULTATION DEADLINE 5PM 25 JULY 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 Document:

- Town Centre

This document has 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 document is available to view on the council's website: [www.crawley.gov.uk/crawley2030spd](http://www.crawley.gov.uk/crawley2030spd) and in hard copy at the Town Hall and Crawley Library during normal office hours.

Many thanks to those who have already submitted comments, they are being collated and will be taken into account when preparing the document in its final form for adoption by the council.

Should you still wish to comment on the document, please note that the consultation period will close at **5pm 25 July 2016**. All responses must be made in writing and can be submitted either by email to [forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk) or by post to:

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Kind Regards,

The Forward Planning Team

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**More information**

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**Contact us**

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### 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: Crawley 2030.

#### Update: Public Consultation 27 June 2016

Public consultation is taking place on the following Supplementary Planning Document (SPD):

» [Town Centre](#)

This document has 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 document is available to view using the links below and in hard copy at the Town Hall and the borough's libraries during normal office hours.

All responses must be made in writing by **5pm on Monday 13 June 2016** and can be submitted either by email to or by post to:

- [Forward Planning](#)
- [Crawley Borough Council](#)
- [Town Hall](#)
- [The Boulevard](#)
- [Crawley](#)
- [RH10 1UZ](#)

If you have any questions relating to this public consultation, please contact Elizabeth Brigden, Planning Policy Manager on 01293 438624 or email [Elizabeth Brigden](#).

#### Town Centre

- » [Town Centre SPD](#)
- » [Consultation Statement](#)

Crawley Borough Council is strongly committed to revitalising the town centre, and there is significant potential to build upon Crawley's many positive attributes to enhance the role of the town centre as a place to work, visit and live.

This SPD seeks to support sustainable regeneration and development in the town centre. It provides guidance to ensure that development contributes positively to Crawley's role as a competitive retail and leisure destination, and achieve a balance between delivering the commercial space needed to support sustainable economic growth and the delivery of well-designed new homes to enhance the role of the town centre as a vibrant neighbourhood. It expands upon the requirements of the following Local Plan Policies:

- » [Policy EC2: Economic Growth in Main Employment Areas](#)
- » [Policy EC5: Primary Shopping Area](#)
- » [Policy EC6: Development Sites within the Town Centre Boundary](#)
- » [Policy EC7: Retail and Leisure Development Outside the Primary Shopping Area](#)

#### Previous Consultations

Consultation has previously taken place on the following Supplementary Planning Documents (SPD):

- » [Green Infrastructure](#)
- » [Planning and Climate Change](#)
- » [Urban Design \(including Parking Standards\)](#)

The representations received on these two documents are currently being considered and addressed, wherever appropriate, into the final versions of the SPDs. The consultation versions of the SPDs can be accessed below.

### In This Section:

- [Planning and Development](#)
- [Planning Policy](#)
- [Local Plan - Crawley 2030](#)
- [Crawley 2030: Supplementary Planning Documents](#)

### Contact Us

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## Green Infrastructure

- [Green Infrastructure SPD](#)
- [Green Infrastructure Map](#)
- [Consultation Statement](#)

Crawley's Green Infrastructure network supports the wellbeing of residents and the environment. Green Infrastructure functions include, but are not limited to: recreation, biodiversity, climate change mitigation/adaptation, drainage, transport, job creation, visual amenity, and food and fuel sources. The SPD sets out the key elements which make up the important assets within the borough and expands upon the requirements of the following Local Plan Policies:

- Policy CH3: Normal Requirements of All New Development
- Policy CH6: Tree Planting and Replacement Standards
- Policy CH7: Structural landscaping
- Policy CH9: Development Outside the Built-Up Area
- Policy CH11: Rights of Way and Access to the Countryside
- Policy ENV1: Green Infrastructure
- Policy ENV2: Biodiversity
- Policy ENV3: Local Green Space
- Policy ENV4: Open Space, Sport and Recreation
- Policy ENV5: Provision of Open Space, Sport and Recreational Facilities

A key element of green infrastructure planning is taking opportunities, where possible, to create multi-functional green spaces to make the best use available land and to enhance the connectivity of the network, and, in applying the Local Plan policy requirements, consideration should be given to how each functions as part of the wider green infrastructure network.

## Planning and Climate Change

- [Planning and Climate Change SPD](#)
- [Guidance Note: Energy and Water Efficiency for Alterations 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 ENV6: Sustainable Design and Construction
- Policy ENV7: District Energy Networks
- Policy ENV8: Development and Flood Risk
- Policy ENV9: 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 CH3: Normal Requirements of all New Development
- Policy ENV1: 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 householder planning applications).

## Urban Design

- [Urban Design SPD \(4 MB\)](#)
- [Parking Standards Plans \(2 MB\)](#)
- [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 urban design principles and guidance in the document relate 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 CH9: 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 adopted Crawley Local Plan. The topic areas currently being prepared as SPDs are:

- Affordable Housing
- Climate Change
- Design
- Green Infrastructure
- 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 adopted Planning Obligations and S106 Agreements SPD will be amended alongside the introduction of the Community Infrastructure Levy (CIL) in Crawley. More details can be found on the council's dedicated CIL webpage: [www.crawley.gov.uk/CIL](http://www.crawley.gov.uk/CIL).

The SPDs will provide guidance and expansion of the [Local Plan policies](#) where it is concluded that additional information adds value, beyond that which is already provided in the Policies and supporting text of the Crawley Borough Local Plan.

#### 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.

#### 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 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 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?

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**Directgov**

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Crawley Borough Council Town Hall The Boulevard Crawley West Sussex RH10 1UZ  
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## APPENDIX C: CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES

TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT			
Respondent	Para/ Page no.	Comments	Council's Response
Dr. B Temple-Pediani		I have no comment to make on the subject.	No further action.
NATS Safeguarding Office		NATS has no comments to make on the SPD.	No further action.
Natural England		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p><b>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise that you consider the following issues:</b></p>	No further action.
		<p><b>Green Infrastructure</b> This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should plan '<i>positively for the creation, protection, enhancement and management of networks of biodiversity and</i></p>	The Town Centre SPD is one of a suite of five SPDs which focus on Affordable Housing, Green Infrastructure, Planning & Climate Change, and Urban Design. Each SPD expands on policies set out in the Local Plan 2015. Natural England

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p><i>green infrastructure</i>'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</li> </ul> <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p>	<p>has provided representations on other SPDs published for consultation, and the council has been able to take this feedback into account in the relevant SPD.</p> <p>The role of Green Infrastructure (GI) and landscaping is important in urban areas, both in terms of promoting attractive developments and in helping to mitigate the impacts of climate change.</p> <p>Urban GI is considered specifically within the Green Infrastructure SPD, which provides guidance on the provision of GI and future maintenance where this is provided as part of development. The SPD also encourages multi-functional open space and the linking of green spaces.</p> <p>Incorporating Green Infrastructure into development proposals is also supported through guidance set out in the Planning &amp; Climate Change SPD and Urban Design SPD. These documents support a range of GI approaches in the planning of development, including Sustainable</p>

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
			Drainage Systems, green roofs, and appropriate landscaping.
		<p><b>Biodiversity enhancement</b>            This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p>	<p>Biodiversity enhancement is a key focus of the Local Plan, specifically through its Character and Environment chapters. These policies are further expanded upon through the Green Infrastructure SPD, which will form a material consideration in planning decisions.</p>
		<p><b>Landscape enhancement</b>            The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on</p>	<p>These issues are considered in detail by the Green Infrastructure SPD.</p>

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

<b>Respondent</b>	<b>Para/ Page no.</b>	<b>Comments</b>	<b>Council's Response</b>
		site, provision is made for succession planting so that new trees will be well established by the time mature trees die.	
		<p><b>Other design considerations</b> The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 125).</p>	
		<p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b> A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	The Town Centre SPD builds upon the town centre focussed policies of the Local Plan. The sustainability impact of these policies, the impact in sustainability terms of alternative policy options that were not pursued, and the impacts on habitats have been assessed as part of the plan making process through the Crawley Local Plan Sustainability Appraisal and Habitats Assessment.
The Marine Management Organisation		<p>Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.*</p> <p>*detailed information on the MMO provided*</p>	No further action.

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
Environment Agency		<p>It is noted that the site highlighted for redevelopment in the Town Centre are outside of the current Flood Map for Planning extents. With this in mind, the risk to the site from fluvial flooding can be assessed as being low.</p> <p>With respect to Question 7: Development and Guidance Principles for Sites` within the Town Centre Boundary – <i>‘Do you have any feedback on the suggested development guidance and principles for these sites?’</i></p> <p>It does appear that a majority of the development sites will include the type of redevelopment which could enable the inclusion of SuDS techniques in the outside spaces. The reduction in the extent of hard surfaced areas and their replacement with green spaces and areas that would allow for the storage, attenuation, conveyance and possibility infiltration of surface water would be of significant benefit.</p> <p>Crawley does suffer from surface water flooding and ways to reduce this risk and to take pressure off local drainage systems should be implemented.</p> <p>Not only would the inclusion of such features help to reduce the risk to surface water flooding, there are other benefits such as those for biodiversity and wildlife, as well as making these spaces more attractive to the local population and visitors, which can have health benefits.</p>	<p>It is recognised that whilst the town centre sites are identified by the Environment Agency Flood Map for Planning as being at a low risk of fluvial flooding, much of the town centre is affected by surface water flooding. To help address issues of surface water flood risk, and ensure that flood risk is not increased elsewhere, Local Plan Policy ENV8 requires development proposals to, where feasible and viable, reduce peak surface water run-off rates through the effective implementation, use and maintenance of SuDS.</p> <p>Guidance supporting the implementation of SuDS through the planning process is set out in detail through the Planning &amp; Climate Change SPD.</p>
Gatwick Airport Limited Aerodrome Safeguarding		<p>We would ask that aerodrome safeguarding is included in this document, as the Crawley Town Centre area is only around 3km South from the airport and developments in this area have the</p>	<p>It is recognised that as a town centre location, developments may seek to maximise the potential of sites</p>

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p>potential to impact on aerodrome operations in a number of ways. We would like the developers to engage with us as soon as possible with regard to their proposals so that any potential issues can be resolved at an early stage.</p> <p>We would be grateful if the following or similar could be added:</p> <p><i>In relation to Gatwick Airport, any proposed development would need to comply with aerodrome safeguarding requirements to ensure that the operational integrity and safety of the airport are not compromised. For example consideration will need to be given to the following:</i></p> <ul style="list-style-type: none"> <li>• <i>The heights of buildings and structures including construction equipment to ensure that they do not infringe the Obstacle Limitation Surfaces (OLS) around the airport or have any impact on radar or other navigational aids utilised by the airport, which could in turn cause a hazard to aircraft</i></li> <li>• <i>Depending on their size and design, landscaping schemes, water bodies, Sustainable Urban Drainage Schemes (SUDS) and large areas of flat/shallow pitched/green roofs, have the potential to attract birds in large numbers which could in turn increase the birdstrike risk to the airport</i></li> <li>• <i>Lighting schemes need to be designed in such a manner as to ensure that they will not dazzle pilots or be confused with aeronautical ground lighting</i></li> <li>• <i>Some renewable energy schemes such as solar and wind energy have the potential to impact on airport operations by distorting radar or causing glint or glare to pilots and air crew</i></li> </ul> <p><i>It is important that you consult with the Safeguarding Section at Gatwick Airport Ltd as early as possible with regard to your</i></p>	<p>through buildings that are of a taller scale. Planning and design considerations such as landscaping, lighting, and renewable energy represent key consideration in aerodrome safeguarding terms. It is agreed that the SPD would benefit from additional wording to clarify how and when aerodrome safeguarding should be considered as part of town centre developments as well as the detailing the appropriate contact.</p> <p>Additional text has therefore been added Section 4 of the SPD (Development Sites within the Town Centre Boundary) in the form of a new section relating to aerodrome safeguarding.</p>

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

<b>Respondent</b>	<b>Para/ Page no.</b>	<b>Comments</b>	<b>Council's Response</b>
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		<p><i>proposals to avoid any potential issues. Please email <a href="mailto:gal.safeguarding@gatwickairport.com">gal.safeguarding@gatwickairport.com</a> and Gatwick Airport Ltd will be happy to advise'.</i></p> <p>With regard to Section 7 – 'Engagement', we note with thanks that Gatwick Airport Ltd is mentioned, please would it also be possible to add Gatwick Airport Ltd Safeguarding Section.</p> <p>Please be advised that the advice given is without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure.</p>	
Thames Water		<p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Crawley Borough and are hence a <b>"specific consultation body"</b> in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:</p>	Noted.
		<p><b><u>General Comments In Relation to Water Supply and Sewerage/Wastewater Infrastructure</u></b></p> <p>A key sustainability objective for the preparation of Local Plans and development proposals should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: <b><i>"Local planning authorities should set out strategic policies for the area in the Local Plan. This should</i></b></p>	<p>The Local Plan 2015 has been informed by the Gatwick Sub-Regional Water Cycle Study (2013), Crawley Infrastructure Plan (2014) and through ongoing stakeholder dialogue with infrastructure providers. Infrastructure provision is covered in detail by Local Plan Policy IN1, which is clear that development will be permitted where it is supported by the necessary infrastructure both on and off site and if mitigation can be</p>

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		<p><b><i>include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></b></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: <b><i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></b></p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <b><i>“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</i></b></p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. It is therefore important that developers demonstrate that adequate wastewater [and water supply] infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies and appraisals to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage [and water supply] infrastructure. Where</p>	<p>provided to avoid any significant cumulative effects on existing infrastructure services.</p> <p>Thames Water identify two sites, Southern Counties and Crawley Station Gateway, where wastewater services represent an issue and where upgrades to the existing drainage infrastructure are likely to be required. Both sites benefit from planning permission and are subject to a condition requiring that a drainage strategy detailing any necessary drainage works is submitted and approved by the Local Authority, and that the works referred to in the strategy are implemented. The Southern Counties site is not included within the SPD as it benefits from Outline planning permission and Approval of Reserved Matters. The Crawley Station Gateway site benefits from Outline planning permission, with Approval of Reserved Matters yet to be submitted. Given that the Outline permission is subject to a condition which is in place to secure the necessary infrastructure upgrades</p>

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

Respondent	Para/ Page no.	Comments	Council's Response
		<p>there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be delivered prior to any occupation of the development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.</p> <p>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 in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SUDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> <li>• improve water quality</li> </ul>	<p>it is not considered necessary to further consider this within the SPD.</p> <p>Local Plan Policy ENV8 requires development proposals to, where feasible and viable, reduce peak surface water run-off rates through the effective implementation, use and maintenance of SuDS. Guidance supporting the implementation of SuDS through the planning process is set out in the Planning &amp; Climate Change SPD.</p> <p>The Planning &amp; Climate Change SPD establishes a clear hierarchy where surface water is to be discharged. This identifies, proceeding from the most desirable to the least desirable options as follows:</p> <ol style="list-style-type: none"> <li>1. Discharge to a watercourse</li> <li>2. Discharge to a surface water drain</li> <li>3. Discharge to the combined sewer.</li> </ol>

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

<b>Respondent</b>	<b>Para/ Page no.</b>	<b>Comments</b>	<b>Council's Response</b>
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		<ul style="list-style-type: none"> <li>• provide opportunities for water efficiency</li> <li>• provide enhanced landscape and visual features</li> <li>• support wildlife</li> <li>• and provide amenity and recreational benefits.</li> </ul> <p>Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for wastewater/sewage treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul>	
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		<p>Thames Water consider that to accord with the NPPF/NPPG and the above, the following policy should be included in the SPD:</p> <p><b><u>“Wastewater &amp; Sewerage Infrastructure</u></b>  <b><i>Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure.</i></b></p> <p><b><i>Drainage on the site must maintain separation of foul and surface flows. 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</i></b></p>	
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Noted. It is considered that the issue of wastewater and sewerage infrastructure is appropriately covered through Local Plan Policy IN1, which is clear that development must be supported by the necessary infrastructure on and off site.

Noted. Wording has been added to the relevant section of the Planning & Climate Change as ‘best practice’ guidance.

**TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT**

<b>Respondent</b>	<b>Para/ Page no.</b>	<b>Comments</b>	<b>Council's Response</b>
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		<p><i>to the foul sewer, as this is the major contributor to sewer flooding</i></p> <p><i>Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered. ”</i></p>	
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		<p><b><u>Specific Water Supply and Sewerage/Wastewater Infrastructure Comments:</u></b></p> <p>The attached table provides Thames Water’s site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure in relation to the proposed housing sites, but more detailed modelling may be required to refine the requirements.</p> <p>These sites have been assessed on an individual base with only limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing.</p> <p>Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development in line with the Core Strategy Policy ICS2: Infrastructure Provision.</p>	
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			<p>As noted above, two sites are specifically identified by Thames Water as giving rise to potential waste water infrastructure concerns, namely Southern Counties and Crawley Station Gateway. Both sites benefit from planning permission and are subject to condition requiring that a drainage strategy detailing any necessary drainage works is submitted and approved by the Local Authority, and that the works referred to in the strategy are implemented.</p> <p>It is therefore considered that sewerage capacity issues related to the sites in question have been addressed and it is not therefore necessary to set out further site specific guidance in the SPD.</p>
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		<p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p>	
John Adlington		<p>Thank you for sending this e-mail and the access to the document. It's long and seems to have been given a great deal of thought. Much of it looks encouraging. And I really appreciate of the work that has gone into it.</p> <p>Having read through it quickly, I'm left with the impression that buildings are going to be higher, that grass areas are going to be smaller and everything should look better?</p> <p>The sense of space, the openness to the sky and the beauty of buildings creates a sense of 'care' and or 'value' for residents and visitors. It doesn't read like we but I hope we are not going to lose that as we did in the 'development' of Queen's Square.</p> <p>My concerns are that though we have the range of uses envisaged (lots of good adjectives included): and this quote looks good,</p> <p>(The National Planning Policy Framework (2012) identifies a range of uses that are directed to town centre locations, which it defines as Main Town Centre uses. These uses are encouraged in Crawley town centre, and are defined by the NPPF as: 'Retail development</p>	<p>Support is noted and appreciated.</p> <p>A key focus of the Town Centre SPD is to help support development that will add to the overall vibrancy and competitiveness of the town centre.</p> <p>The SPD and overarching policies of the Local Plan seek to support a range of main town centre uses, and also (in conjunction with other SPDs) seek to ensure that these come forward in an attractive and well-designed manner which adds to the overall role of the town as a place that people want to visit, work and live.</p> <p>The Local Plan and Town Centre SPD are supportive of town centre living and residential is encouraged, particularly as part of mixed use</p>

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		<p>(including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)'.                      The theatres, museum, galleries and concert halls developments don't seem to be mentioned anywhere other than within the few times in the above quote is repeated?                      My concern is also that the last time Crawley Council encouraged the creation of more shops we were just about to enter a recession that was being predicted. We now have lots of pound shops and charity shops, - about which I have no complaint - except the building on top of a large section of our beautiful old square.                      So, I hope the drawings of new plans will also include some models (real or computer 3D creations) that let us see something of the actuality of what is proposed.                      I'm am delighted that people will have homes and opportunities.                      Thank you for asking for our views,                      John Adlington</p>	<p>development. Given the need to maximise the use of Crawley's limited available land supply, it will for some town centre sites be appropriate to consider taller/denser development. Design policies set out in the Local Plan, and guidance established by the Urban Design and Town Centre SPDs will help ensure that development is of a good design that enhances the town centre.                      Because of the economic challenges to achieving retail-led town centre the regeneration, the council has prioritised the regeneration and improvement of the Queens Square public realm. It is envisaged that this will boost the town centre, helping to improve its attractiveness as a destination for retailers and visitors.                      The planning policies for the town centre are flexible to enable a range of uses to come forward, including cultural uses such as concert hall, gallery, theatre or museum uses. Work is already underway to relocate Crawley Museum from Goffs Park to The Tree on Crawley High Street, which will include the refurbishment</p>

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			and improvement of the Listed Building. Support for homes and job creation is noted and appreciated.
West Sussex County Council		Thank you for the opportunity to comment upon the draft Supplementary Planning Document (SPD) for Crawley Town Centre. The County Council's officer comments upon the draft SPD are set out below:	
	Question 2	<p><b>Question 2: Controlling the Loss of Employment Floorspace in the Town Centre</b></p> <p><b><i>Does the Town Centre SPD strike an appropriate balance between planning for Main Town Centre uses such as commercial, leisure and retail and supporting the delivery of residential development?</i></b></p> <p>Comment: In stating that "Where residential development is proposed on upper floors or at locations allocated in the Local Plan for residential use, applicants will not be required to provide information justifying loss of employment floorspace. ", is there a danger that the guidance to applying Policy EC2 could facilitate excessive loss of town centre employment floorspace? Should not applications for residential development on upper floors be assessed against the criteria of Local Plan Policy EC2?</p>	<p>As a result of Crawley's limited available land supply, there is a need to plan positively and flexibly to meet identified needs and balance the delivery of residential and employment uses. This was considered as part of the Local Plan process, which sought to maximise the scope for housing delivery by allowing greater flexibility for town centre residential. The approach was taken also having regard to the (now permanent) permitted development rights which allow B1(a) office and B8 storage &amp; distribution uses to convert to residential through the prior approval process.</p> <p>Much of the office space located above ground floor units is unsuitable</p>

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			<p>to meet market needs and cannot be readily adapted to do so, remaining long-term vacant. This has led to several units being converted to residential through prior approval or planning permission. Therefore the approach seeks to provide flexibility to enable residential to come forward where there is little prospect of a unit returning to active business use.</p> <p>The Local Plan is subject to ongoing monitoring, and the effects of the policy approach will be reviewed, and if necessary, revisited as part of a Local Plan review.</p> <p>The Local Plan continues to protect the employment function of the Primary Shopping Area through Policy EC5.</p>
	Question 3	<p><b>Question 3: Ground Floor Changes of Use in the Primary Shopping Area</b></p> <p><i>a.) Does the Town Centre SPD provide enough guidance to explain when an economic statement is required and the type of information that is needed?</i></p>	<p>a.) The economic statement will be expected to make a case as to how the proposed use will support the vitality and viability of the town centre. The role of the economic statement is to provide an overview of how the proposal would operate and of any benefits it would bring to the town centre.</p>

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		<p>Comment: Would an applicant submitting an economic statement be expected to provide evidence supporting any claims made? If so it is suggested that the guidance refers to this.</p> <p><b>b.) Are there any other ways in which proposals can show how they would support the vitality and viability of the town centre which can be referred to in the guidance?</b></p> <p>Comment: Suggest asking for evidence in support of how the application will comply with Local Plan Policy EC5.</p>	<p>The ability of an applicant to provide information will vary on a case-by-case basis depending on whether it is a new or established operation, and although evidence will of course add robustness to the statement it is appreciated that in some cases it may only be possible to provide indicative information.</p> <p>b.) Noted. The intention is to provide guidance to assist applicants in meeting the requirements of Local Plan Policy EC5.</p>
	Question 4	<p><b>Question 4: Upper Floor Change of Use in the Primary Shopping Area to Main Town Centre Uses or Community Uses)</b></p> <p><b><i>Does the policy set out appropriate criteria to ensure that upper floor development for main town centre uses contribute positively to the town centre?</i></b></p> <p>Comment: It is assumed that this is referring to the guidance immediately above Q4 rather than Policy EC5 itself. If this is the case is there a need to refer to any evidence that applicants will be expected to provide in order to demonstrate compliance with Policy EC5?</p>	<p>Noted. For clarity, this question is referring to the guidance above Q4 rather than Policy EC5 itself.</p> <p>Local Plan Policy EC5 encourages the effective and efficient use of upper floors within the Primary Shopping Area for a range of main town centre uses. The SPD guidance recognises that some types of upper floor uses have the potential to impact on existing nearby uses and highlights that this will need to be considered as part of the application process. Much</p>

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			<p>will of course depend upon the change of use proposed, but in general terms a noise assessment will be required for A3/A4/A5 proposals or any development which is likely to be noisy.</p> <p>Title headings for grey boxes have been amended to make clear that these are intended to show applicants how the requirements of Policy EC5 can be met.</p> <p>It is considered that there would be merit in advising applicants to consult with the council's Environmental Health team at an early stage, and additional text has been added to para 3.26 to this effect.</p>
	Question 5	<p><b>Question 5: Upper Floor Change of Use in the Primary Shopping Area to Residential Uses</b></p> <p><b><i>a.) Does the policy set out appropriate criteria to ensure that upper floor residential development contributes positively to the town centre?</i></b></p> <p><b><i>b.) Are there other measures that can help to manage the relationship between commercial and residential uses in the Town Centre?</i></b></p> <p>Comment: Same comment as under Q4 above.</p>	<p>As above. The Town Centre SPD seeks to provide guidance to assist applicants in designing and planning schemes. Local Plan Policy EC5 is supportive of upper floor residential uses in the Primary Shopping Area, and the role of the SPD is to set out design guidance to help ensure that upper floor residential development comes forward in a way that enhances the town centre. Therefore,</p>

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			whilst evidence is not specifically required, the guidance set out in the SPD should be factored into the design of development as good practice. To provide further clarity, the title of the grey box on page 17 has been amended to show how to meet the requirements of Policy EC5.
Question 6		<p><b>Question 6: General Development Principles for Town Centre sites</b></p> <p><i>Do you have any comments on the general development principles for town centre sites?</i></p> <p>Comment: Where appropriate developers have to demonstrate impacts on local roads and accessibility to the development. With reference to "improve links between different areas of the town centre " this could be made more specific to sustainable modes i.e. walk, cycle and public transport</p>	Noted. Additional wording added to last bullet point to refer to sustainable transport links.
Question 7		<p><b>Question 7: Development Guidance and Principles for Sites within the Town Centre Boundary</b></p> <p><i>Do you have any feedback on the suggested development guidance and principles for these sites?</i></p> <p><u>Traders Market and Brittingham House</u></p> <p>Comment: As The Boulevard is now intended to remain open to traffic it is understood that past aspirations to turn Pegler Way into a two-way road may no longer be pursued. This being the case it should make any public realm improvements at the traffic signal</p>	Noted. There are currently no proposals to close The Boulevard. When any development proposals are assessed, the possibility of introducing two-way traffic along Pegler Way to allow for a bus-only section on the High Street to improve pedestrian and cycle movement will

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		<p>junction more straightforward. If on the other hand two-way traffic along Pegler Way is still being considered then this would be more complicated as it would require changes to the current Morrison's access arrangement which would involve a new traffic signal junction on Pegler Way.</p>	<p>need to be considered by the councils and the developer.</p>
		<p><u>Telford Place</u>                      Comment: Option 2 with a new access road onto the Haslett Avenue roundabout to the rear of the library is one that WSCC would support as it has been model tested as part of an earlier planning application. We currently have significant reservations about the creation of a fourth arm onto the Southgate Avenue traffic signal junction as shown on Option 1. This junction is already very busy in peak periods and the likely increase in delays could make such an option unacceptable in terms of traffic impact.</p>	<p>Noted. Options have been removed and a single principle for development scheme presented. An alternative, contingency plan is provided for in case that an access via the rear of the library cannot be achieved. It is indicated that this option will require coordination with the Highways Authority.</p>
		<p><u>Crawley Station and Car Parks (Station Gateway)</u>                      Comment: The redevelopment of the station and car parks has recently received outline planning permission, so it is assumed that this scheme will now progress.</p>	<p>Noted. As the proposal has outline permission with Approval of Reserved Matters still needed, it is considered appropriate to retain design principles and guidance for the site within the SPD.</p>

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	Question 10	<p><b>Question 10: Engagement</b></p> <p><b>Have we identified the key stakeholder groups that have an interest in the future planning of the town centre? Are there any stakeholders missing?</b></p> <p>Comment: Given that Gatwick Airport Limited are on the list of stakeholders in paragraph 7.3, should this list also include Manor Royal BID?</p>	<p>Gatwick Airport Limited is identified as a key Town Centre stakeholder due to its role as a statutory consultee in relation to aerodrome safeguarding, and the limitations this can place on building heights and scheme design across the town. Whilst Manor Royal is of key economic importance within a Crawley and sub-regional economic context, the Manor Royal BID remit covers the specific area of Manor Royal Business District and it is not considered necessary to identify Manor Royal BID as key Town Centre stakeholder.</p>
		<p>Please note that a separate response relating specifically to the County Buildings site has been provided on behalf of the County Council's Valuation and Estates team.</p>	<p>Noted.</p>
Arshad Khan		<p>Don't turn Crawley into concrete jungle</p>	<p>Noted.</p>
John Cooban		<p>I am concerned that proposals for the area north of The Boulevard do not give sufficient guarantee of safeguarding the valuable architectural quality of the main frontage elevation of the Town Hall and Civic Hall. This is an important heritage building for Crawley. Its facing / cladding appears to be a reconstituted shelly material of a very special quality and pleasing appearance which I suggest is at least as important to the built and design heritage of the town as,</p>	<p>Whilst the Town Hall building is recognised as an example of new town architecture, it has a number of modern alterations that detract from its setting, notably a substantial extension, and being a public building in constant use, many original features have been removed or</p>

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		for example, the 'Pulhamite' material which has been recognised for preservation at Worth Park.	modernised. The Town Hall falls within an area that has been identified for regeneration through the Local Plan (2015-2030). Given the limited local architectural and historic merit, it was not previously considered that that the Town Hall should be Locally Listed, and having regard to the wider regeneration aspirations for the site, it is not felt that there has been any material change in circumstances that would currently justify a change in this position.
West Sussex County Council Valuation and Estates	County Buildings	<p>I have provided below a response to The Crawley Town Centre SPD as part of the current Public Consultation. This response is provided on behalf of the Valuation and Estates team at West Sussex County Council and specifically relates to the County Buildings site within the town centre.</p> <p><b>Question 7: Development Guidance and Principles for Sites within the Town Centre Boundary</b></p> <p><b><i>Do you have any feedback on the suggested development guidance and principles for these sites?</i></b></p> <p><u>County Buildings</u> We have comments upon the following issues as presented in the guidance and principles:</p> <p>a) Scale/Massing/Height - Planners from CBC have previously agreed that the maximum height they would want to see is 8</p>	<p>The SPD makes clear, at paragraph 4.10, that the site specific guidance provided is not intended to be prescriptive. Rather, it seeks to demonstrate how development proposals could satisfy the policy requirements set out in the Local Plan.</p> <p>a) Noted. Height limits have been amended to reflect GAL height limitations and a need to address acceptable height to public realm ratio so that development does not negatively impact on the quality and design of the proposed public realm/spaces. A</p>

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		<p>storeys. We consider that the proposal for a maximum of 5 storeys is disproportionately low and does not create an efficient use of the site. It will not be in keeping with the adjacent Crawley Borough Council Building which is already 7 storeys and the Central Sussex College opposite which is 11 storeys. We believe that County Buildings must relate to these two sites. It is noted in the SPD guidance for the Land North of The Boulevard site that developments located at either end of The Boulevard may be permitted to increase in height. As The Boulevard is adjacent to our site we believe it will look odd if the levels suddenly drop at the County Buildings site.</p> <p>b) Landmark buildings - are permitted on Land North of the Boulevard whilst the County Buildings site is referred to as a "self-contained town centre quarter". Our submission is that such a concept will not create a seamless and holistic approach to regeneration of the town centre and blend with the adjacent sites. It will look divorced and odd, not creating a cohesive regeneration and rather emphasising the current disjointed nature of the site. In earlier discussions with CBC it was envisaged that County Buildings would be phase one of a comprehensive Masterplan but it is not clear whether this is still the case from the proposals set out in the SPD.</p> <p>c) Encourage office/commercial uses on upper floors – County Buildings is one of several sites proposed for mixed-uses but is the only site where it is explicitly stated that office/commercial uses will be encouraged on the upper floors. We will seek to provide some commercial use but do not need it to be stipulated on the upper floors. We request that this stipulation be removed to maintain flexibility as the market is changing and we do not want explicit</p>	<p>Careful assessment (based on best practices) will need to be carried out to ascertain an acceptable height to public realm ratio.</p> <p>b) The site will not be divorced from the Town Centre so long as public realm works and improvements are carried out in an integrated manner that improves connections and circulation.</p> <p>c) A robust mix of uses will be required, which can include offices, residential and retail. Flexibility in internal designs will allow for changes that respond to the market. It is clearly stated that office/commercial use will be encouraged and residential will be permitted so long as it doesn't prejudice ground floor activity.</p> <p>d) The inclusion of Centenary House within the development footprint enlarges the development potential of the site and removes the need for small pavilions. The development principles have been amended accordingly.</p>

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		<p>statements that may be outdated by the time this site comes forward.</p> <p>d) "encourage small pavilions (temporary or permanent)" – This is considered to be not the right location and is not an efficient use of the site. There is not sufficient public footfall for this type of use which we believe would not work well with the mixed use nature of the site and adjacent police station. This use should be retained in Queens Square in the centre of Crawley.</p> <p>e) Architectural merit - "U shaped mid-20<sup>th</sup> century low rise office-administrative buildings" and "little rotunda" – We consider these to be dilapidated office buildings that are not fit for purpose. They have no architectural merit and a comprehensive redevelopment would ensure this gateway site provided exemplar design and fit for purpose mixed use accommodation that will attract premium commercial occupiers, thus boosting the economy and vitality of the town. Keeping as existing would not achieve this and would be inconsistent with the new design proposals that the SPD envisages along The Boulevard. Keeping the existing buildings would, we suggest, look clumsy and disjointed. In addition, the rotunda is not an efficient shape for use as a café; coffee operators do not favour this configuration and its inclusion does not make efficient use of the site.</p> <p>f) Centenary House – The SPD's Planning and Design Principles indicate that Centenary House would be retained and if possible refurbished and extended. Options for retention or demolition have been discussed with CBC officers. The property is very outdated and dilapidated and we believe it is not fit for purpose and a report by office agents has backed this up. We therefore need the option</p>	<p>e) These buildings are considered to represent fine examples of mid-20<sup>th</sup> Century New Town architecture and form an important part of Crawley's built history. Their current state does not preclude their restoration and renewal for reuse, and developers would be expected to demonstrate how these buildings have been considered as part of the design process. The reuse of existing built fabric is generally accepted to greatly contribute to sustainability goals. A café is one possible use for the rotunda if this is retained as part of the redevelopment of the site. Policy EC5 is intended to enable a flexible range of uses, and whilst a café would be viewed as a positive means of attracting footfall to this part of the town centre, other appropriate 'drawcard' uses can also achieve this objective.</p> <p>f) The draft SPD had suggested the retention of Centenary House as a possible option in achieving the regeneration of this site. It is</p>

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		<p>to replace the building in order to attract the best occupiers and contribute to the vitality and economy of the town centre.</p> <p>g) Exchange Road and Woodfield Road – these have previously been discussed as being stopped up and turned into public realm alongside the proposals to reduce the size of the roundabout opposite County Buildings, thereby integrating with public realm proposals along The Boulevard. Again this would link the County Buildings site to the Town Hall and the remainder of The Boulevard to provide a more holistic regeneration for the town centre.</p> <p>To sum up the future of the County Buildings site has been discussed with Crawley BC officers on many occasions and a jointly commissioned study into options for both County Buildings and Crawley Town Hall has been undertaken. There have also been sketch plans produced to indicate how a residential/mixed use scheme could work. In our view the guidance currently set out on pages 33-34 of the SPD does not reflect the discussions that have taken place. We would therefore request that a review of the draft guidance be carried out and to inform that process we would welcome the opportunity for further discussions with Crawley BC officers to clarify both authorities' aspirations for this important site.</p>	<p>however appreciated that the inclusion of Centenary House in the development site enlarges the overall development potential of the site. Principles and plan have been amended to this effect.</p> <p>g) Public Realm proposals are critical to Town Centre regeneration and in particular to the success of the proposed self-contained quarter on this site. Any improvements will need to be carefully considered. Closure of roads without providing a framework for appropriate uses that create footfall are hasty and should be avoided. Furthermore references to the Eastern Gateway to the Town Centre have been added to indicate how public realm works can connect the three Easter Gateway projects (County Buildings, North of the Boulevard Site and College Buildings).</p> <p>Additional principles have been added as a contingency in the case that existing buildings cannot be retained.</p>

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Mole Valley District Council		<p>Thank you for consulting MVDC on the draft Crawley Town Centre SPD. I can confirm that Mole Valley has no objection to the content of the document.</p> <p>The southern half of MVDC is in Crawley's Travel to Work Area. As such any economic improvement to the town centre may be beneficial to Mole Valley residents as it would offer wider employment opportunities.</p>	Noted and support welcomed.
Historic England		<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.</p> <p>Historic England welcomes the Town Centre SPD and, in particular, endorses its comments in relation to the requirement for the development of key sites to be sensitive to the effects it may have of heritage assets such as conservation areas and listed buildings and their settings. Historic England would strongly advise that the Council's own conservation advisers are closely involved throughout the preparation of the SPD, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment.</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or</p>	Noted and support welcomed.

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		later versions of the plan and which may, in our view, have adverse effects on the historic environment.	
Highways England		<p>Thank you for your correspondence of 27<sup>th</sup> June consulting Highways England over the Draft Town Centre Supplementary Planning Document.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the M23 &amp; A23.</p> <p>Having examined the above draft SPD, we offer no further comment at this time.</p>	Noted.
Westrock Ltd.	Land North of the Boulevard	Detailed comments attached including Plan <sup>***</sup>	
		1.1 DMH Stallard act on behalf of Westrock Ltd in relation to land at the Boulevard, Crawley. This report sets out our site specific submissions relating to the car park site at 11-13 the Boulevard, the	Noted and support welcomed.

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		<p>wider Boulevard development area, and the related contents of the SPD.</p> <p>1.2 The Town Centre SPD is concerned with development within the boundary of the town centre of Crawley and sets out the general principles for development within this area. It is noted that the purposes of the SPD is to provide information and advice on the interpretation of the town centre focused policies of the Crawley Local Plan (2015). The SPD therefore, relates specifically to planning policies EC2, EC5, EC6 and EC7 of the Crawley Local Plan (2015).</p> <p>1.3 The Council have recognised that the Town Centre is a highly sustainable location and that the site identified in the Crawley Local Plan represent a significant opportunity to deliver residential development. We agree and support the Council's view on the development of the town centre.</p> <p>1.4 The SPD also contains site-specific guidance on those sites identified and allocated for development in the Local Plan, the SPD sets out that this is to assist in the delivery of these identified sites. It should be noted that the SPD identifies that "The site specific guidance is not intended to be prescriptive. Rather, it seeks to demonstrate how development proposals could satisfy the policy requirements set out in the Local Plan". This distinction is important, as it follows therefore that development should not be refused if specific guidance in the SPD can not be complied with.</p> <p>1.5 Paragraph 153 of the National Planning Policy Framework (NPPF) states that "Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should only be used where they can help</p>	
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applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.” Furthermore, legislation contained in the Town and Country Planning (Local Planning) (England) Regulations 2012, states that policies contained in a SPD must not conflict with the adopted development plan.

1.6 The SPD provides site specific guidance which is relevant to the car park at 11-13 The Boulevard, and the neighbouring buildings. These sites are located within the wider area classed as Land North of The Boulevard. The Site at 11-13 the Boulevard is currently used as a public car park and has been identified in the Crawley 2030 Local Plan as being within a Key Redevelopment Opportunity area in the Town Centre. This area of the town centre has a long history of promotion and allocation through the Local Plan process.

**Land North of The Boulevard**

1.7 The SPD provides site specific design guidance and principles on each of the sites identified in policy EC6 of the Local Plan (2015). One of which is the area known as Land North of the Boulevard.

1.8 The SPD describes the Boulevard as one of the town centre’s key east-west vehicle arteries, and a wide, tree-lined road. It is noted that the Boulevard is a wide tree-lined road, however, it is important to note that the Boulevard is not uniform in width along the length of the road, furthermore it is not uniform in building design and height, and therefore is not considered to be equal to other more traditional Boulevards. The northern side of the road

1.8: The Boulevard is a key aspect of the Crawley new town design, and whilst more traditional examples may exist elsewhere, The Boulevard is recognised in the Local Plan for its important linear views, and represents an important feature of Crawley’s design within a Crawley context.

1.9: Map amended to show buildings at terminus of boulevard.

1.10: Noted. A grand axis is achieved by way of strengthening the

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		<p>was predominantly office buildings, and the SPD correctly identifies that not all of the buildings continue to be used for commercial properties as a result of recent conversions to residential.</p> <p>1.9 The SPD refers to the townscape context of The Boulevard and advises that the Boulevard is considered to run from western end of the Morrisons building to the eastern end of the Sussex College tower. We agree with this assessment and consider that the Sussex College building and Morrisons building should be taken into consideration due to its proximity to the Land North of the Boulevard. However, both of these buildings are not shown on the associated map included in the SPD, and given they are included in the townscape context description, we consider that this map should be amended to include these two buildings.</p> <p>1.10 The SPD also describes the vision of the Council in relation to development on the Land North of the Boulevard, this vision is for the establishment of the Boulevard as a 'grand axis' to Crawley. However, it is unclear from the SPD how this is expected to be achieved, and it is our view that this should be clarified.</p> <p>1.11 The SPD refers specifically to the area known as 'Land North of The Boulevard' and the existing car park. Page 39 of the SPD states that Land to the North of The Boulevard, particularly the car park situated immediately to the east of Babcock House is considered to represent a key redevelopment opportunity. It is identified as a 'Priority Landmark Development Site' within the map contained in the SPD. We agree with this statement and consider that the car park site offers a significant opportunity to provide much needed housing in this highly sustainable location.</p>	<p>streetscape, defining building lines, creating a strong sense of enclosure, improving the public realm, reducing car domination on the road way in order to promote walkability. All these factors are detailed in the site specific guidance.</p>

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		1.12 The site is deliverable and this is demonstrated by the fact that Westrock Ltd are in the process of finalising the details prior to the submission of a planning application on the site.	
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**Key Planning and Design Principles**

		1.13 The key planning and design principles for development on Land North of the Boulevard is set out in the SPD. These principles are considered to be prescriptive and detailed, and we are concerned that a number of these principles may be used to act as a barrier to otherwise appropriate development coming forward in this area.	<p>It is noted that the representor's comments are provided within the specific context of the car park site west of the town hall, rather than within the context of the wider Key Opportunity Site identified in the Local Plan as Land North of The Boulevard.</p> <p>1.13: The intention of the site specific development principles are to provide design guidance and assist in the planning and design of development that is both future considerate but also sensitive to the Town Centre today.</p> <p>1.14: The principle of a uniform building line is not restricted (and is not required to be restricted) to the existing building line. The building line principle is intended to establish a desired effect, which in this case, is a uniform building line that is currently missing from The Boulevard and detracts from the quality of its public realm. The existing intermittent recessed building line erodes the</p>
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		1.14 The first point of these principles advises that "New development should adopt a horizontally focused massing and follow a uniform building line". It is important to note however, that the current building line of the Boulevard is not uniform, the map included in this section of the SPD shows that some of the existing buildings on the Boulevard protrude forward of the notional dotted line shown on the map, and some buildings are actually recessed from this notional building line.
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		1.15 The current character of the Boulevard is one of mainly horizontal elements, but these are punctuated by vertical elements. For example, the 6-storey element on the west side of the Town Hall, a new build structure where the central part of the Broadway building steps forward in plan and elevation. These vertical punctuations add variety to the skyline.
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		1.16 Horizontal emphasis can be achieved through the repetition of vertical elements along the street. Vertical emphasis is a positive contribution to the skyline when landmark buildings are required.
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		<p>One such landmark building with vertical emphasis is Central Sussex College. It is our view that the College should be taken into consideration due to its proximity to the 'Land North of the Boulevard' and the Crawley Civic office development site. Vertical elements puncture the horizontal more frequently at the east end of the Boulevard and should be used to establish repetition and consistency. Please see the key view, circulation and building line analysis plan, which demonstrates the current irregular and inconsistent line. This plan is attached at the end of this representation. ***</p> <p>1.17 The dotted black line shown on the map on page 39 of the SPD is not a true reflection of the building line. It also creates a zone from the pavement and site boundaries which do not contribute to the public realm. It only seems to reinforce an already wide street. Currently the zoning of the Boulevard is traffic, landscaping, pavement, site boundaries, buildings etc, which needs to be considered carefully. The current areas of surface parking in front of the buildings, particularly on either end of the Boulevard, is not attractive and detract from the public realm. The current arrangement is detrimental to active frontages and the landscaping and surface parking zones should be swapped.</p> <p>1.18 In relation to the car park site, it should be noted that this site is relatively narrow in width, and therefore in order to provide an appropriate and viable level of development on site it is considered necessary to develop the site vertically. The narrow width of this site and proximity of neighbouring buildings precludes the site from coming forwards as a horizontally massed development.</p>	<p>definition of the streetscape and it is therefore undesirable to replicate this.</p> <p>1.15: As above, buildings that which protrude beyond the streetscape into the roadway with vertical punctuations are considered to be undesirable. These should not be replicated and will not be encouraged in design terms.</p> <p>1.16: Landmark status isn't always expressed by way of height, and may be achieved through other means, for example through materials, design, site layout, landscaping or location.</p> <p>1.17: Noted. The black line is not a true representation of the building line. Rather it is indicative and schematic to annotate the principle.</p> <p>It is felt that the issues raised by a wide street can be best addressed by way of establishing a uniform building line together with a reduction in surface parking at the front of buildings and public realm improvements. A development principle to this effect has been included.</p>

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1.19 It should be noted that the area to the south of the Boulevard is also considered to be an area of potential development opportunity. This side of the Boulevard is also not uniform in its building line and heights of the buildings, the map contained in this section of the SPD demonstrates this with a black line which protrudes out at the westernmost end from the other buildings.

1.20 The importance of the car park site for development is noted in the principles section, which states that this site should be prioritised for landmark development. It should be recognised in the SPD that horizontal massing is not considered appropriate for this part of the Land North of the Boulevard.

1.21 The third key principle refers to building heights of developments, and states that as a general rule heights visible from the street should follow building heights. It is considered that clarification is needed on which building heights are being referred to. The building heights are very varied along the Boulevard. The townscape context has noted that the Boulevard extends from the Morrisons building in the west and the Sussex College building in the east, this area is broad and covers a number of buildings of varying height. Sussex College, for example, is an 11-storey building, however the buildings at the western end of the Boulevard including the Post Office are 2-storey in height. There is therefore scope for landmark buildings at the eastern end of the Boulevard to follow the higher building heights at this end of the Boulevard, and indeed for landmark buildings to be higher still. It is not considered that the building height along the Boulevard is uniform, and as such it is considered that this sentence needs to be clarified or amended.

1.18: Principles for development on the Land North of the Boulevard Opportunity Site address the site as a whole. While the Council appreciates that individual sites may come forward independently, the same principles will still apply to parts of the wider North of the Boulevard site as independent proposals.

Nevertheless, a wider scheme would provide more opportunity for development and comply with Policy CH4 of the Local Plan which specifies that development should use land efficiently and not unduly restrict the development potential of adjoining land.

1.19: Public realm improvements will address land on the south side of the Boulevard.

1.20: Development on the car park site should be approached comprehensively as part of the northern flank of The Boulevard. As such, a horizontal expression is required, to ensure that it does not sit out of context with other

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		<p>1.22 We consider that horizontally focused massing and a uniform building line are not appropriate and that the SPD advice is inconsistent given the comments below.</p> <p>1.23 It is noted that the fifth key design principle contained in the SPD states that developments located at either end of the Boulevard may be permitted to increase in height, pursuant to the appropriateness of the design. We agree with this principle and support this statement.</p> <p>1.24 The sixth principle advises that “The north side of the Boulevard should be punctuated by landmark buildings by way of innovative and appropriate colour palettes, materials and styling.” The definition of a landmark building should not be limited to ‘colour palettes, materials and styling’. It is considered that landmark buildings can be created through other methods including the height and form of proposed buildings, which can break the conventions in the street building line, and that through the use of different building heights landmark buildings can be created.</p> <p>1.25 This sixth principle also states that “The car park site directly opposite The Pavement should be prioritised for landmark development, due to its visual relationship with this important axis.” We agree that this building should be a distinctive building, it is important to note that the current landscaping on the Boulevard could conceal part of a landmark building in this location, however, the trees in this location should be retained in order to keep the continuity of the street line.</p>	<p>developments on the north side of the Boulevard.</p> <p>1.21: Building heights: The guidance was referring to existing building heights along the Boulevard. Maximum overall height should not impact on the quality of the street or on the amenity of adjacent properties. The views of GAL will be important within an aerodrome safeguarding context.</p> <p>Buildings that serve as terminus points for the Boulevard axis (College Tower and Morrisons) will not define the acceptable building height for the streetscape as they are terminus/focal points and not part of the street fabric.</p> <p>1.24: The definition of a landmark building need not be limited to colour palette, materials and styling – only where other characteristics such as height, can be justified. Otherwise, at a minimum, landmark buildings will need to feature colour, material and styling treatments that assist them stand out.</p> <p>1.25: Trees are an important feature of Crawley, and some trees in and</p>

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			<p>around the town centre are identified as structural landscaping (Policy CH7), which will normally be retained where desirable and feasible. Where development would result in a loss of trees, Local Plan Policy CH6 sets out the policy position in relation to tree planting and replacement standards. The Boulevard planting is an important component to the streetscape. The design of new developments would need to consider how trees can best be accommodated.</p>
		<p><b>Public Realm</b></p> <p>1.26 It is noted that one of the key principles is that proposals for public realm improvements and developments includes the reduction of car dominance. This sentence is considered to be confusing, it is unclear if car dominance refers to the use of cars along the Boulevard, or the amount of car parking which is situated along the Boulevard and currently detracts from the public realm.</p> <p>1.27 With regards to the use of cars, it should be noted that the Boulevard is a major town centre road, and this principle could be considered at odds with the Council's assertion that the Boulevard is one of the town centre's key east-west vehicle arteries. Whilst the reduction in car use is to be supported, it is considered that the</p>	<p>1.26 and 1.27: Car dominance refers to: a. amount of space given over to parking, and b. the width of the roadway that preferences cars (a shift is required to preference cyclists and pedestrians). A clarification of car dominance has been included.</p> <p>The Boulevard is an important east/west link across the town centre for local traffic, but does not carry a significant amount of traffic so is not a critical section of Crawley's overarching road network. Therefore</p>

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		<p>reduction of car dominance on the Boulevard can only come forward as part of a strategic, joined-up approach which will provide viable travel alternatives to the private car. The SPD is not considered the most appropriate way to try and achieve this objective.</p> <p>1.28 With regards to the reduction in the amount of car parks and concentration of parking located along the Boulevard, then this can only be achieved through redevelopment of these sites. The Council will need to clarify this and indicate whether the south side of the Boulevard is considered to be a future development opportunity.</p> <p>1.29 As previously stated the various layers of the public realm need to be carefully considered. The areas of surface parking separate the buildings from green space and pavement. If active frontages are to be encouraged this needs to be addressed. The Boulevard does not have a lively feeling considering the perceived importance of the area. This could be addressed through active frontages, but the current disconnect between thoroughfare and buildings will need to be tackled. This could be achieved by removing or repositioning the parking and creating a more pedestrian friendly green route and clear pedestrian crossing from the south to the north side of the Boulevard.</p>	<p>an objective of the SPD development principles is to reduce the road space (i.e. the amount of space that is given over to motor vehicles and parking), whilst keeping the route open for the limited traffic that uses it. Scoping work undertaken on behalf of the council has found traffic calming, reduced road width and pedestrian improvements to be a workable means of reducing the overall traffic flow and reducing the amount of space that is given over to the road and parking.</p> <p>1.28: Reduction of car parking can be achieved through public realm improvements.</p>
General Comments on the SPD		<p><b>General comments on the SPD</b></p> <p>1.30 The use of the phrase 'active frontage' is used quite a lot in the SPD, in the context of both commercial and residential development sites, however, the Council have not defined exactly</p>	<p>1.30: The objective of achieving active frontages can be realised through a variety of means. Overall, the desirable outcome is avoiding blank walls and increasing visual interest and activity and improving</p>

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		what an active frontage would be considered to be. It would be useful therefore to provide some sort of description.	surveillance. Active Frontages was defined as a term in the SPD Glossary, but additional wording has been added for clarity.
		1.31 The word 'landmark' also features in the SPD on a number of instances. It is thought that a landmark building could be provided through an innovatively designed building, however, it is considered that it would be useful if some sort of description could be provided in order to understand what the Council considers this sort of building to be.	1.31: A building can act as a landmark in various ways, through its size/height, through innovative or unusual design, or colour or materials or location and position along the street. No prescriptive definition of a landmark building can be provided.
		1.32 The SPD makes reference to 20th Century buildings in the primary shopping area of the town, given the New Town architecture of this part of the town centre, it is considered that this term is too broad and open to misinterpretation. It is therefore considered that this should be amended to mid-20th Century.	1.32: Reference to 20 <sup>th</sup> Century buildings has been amended to refer to mid-20 <sup>th</sup> Century buildings.
		1.33 The SPD refers to controlling the loss of employment floorspace in the town centre. Policy EC2 of the Local Plan refers to supporting sustainable economic growth in the town centre. The SPD recognises that Crawley town centre's function is not purely for economic development as it is also identified as an appropriate area for residential use. The SPD provides clarification regarding residential uses in the town centre and the loss of economic land through the redevelopment of these sites, particularly on those allocated for residential development. The SPD confirms that the	The Local Plan recognises that whilst a principle function of the town centre is its economic role, it also represents a highly sustainable location for people to live, with good access to facilities, services and sustainable transport links.

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requirement of EC2 to justify the loss of economic/employment floorspace is not necessary on those sites which have been allocated for housing in the Local Plan, including the Boulevard car park site. We consider that this is logical and support the Council's approach on this matter.

1.34 The SPD states that sites identified in the Local Plan and through planning permissions and prior approval applications will deliver around 1,500 new homes in the town centre over the next 15 years. The Local Plan however, only identifies 499 net dwellings through the site allocations in the town centre, the Council are therefore expecting over 1,000 new homes to come forward in the town centre outside of these site allocations. It is considered that the amount of housing that may come forward on these other sites in the town centre will be less than this, especially as those sites which are not allocated in the Local Plan will be required to provide justification for the loss of employment/economic floorspace. As such, consideration and flexibility should be given to the level of housing development on the allocated sites when they come forward through planning applications, and where appropriate a higher level of housing should be permitted to come forward on these allocated sites. It is our view that reference should be made to this in the SPD.

This is incorrect. The Local Plan identifies that 1,500 new homes will come forward in the town centre, and allocates a number of sites to achieve this. This includes Key Opportunity Sites identified by Policy EC6 which set out that a minimum of 499 homes will be delivered across the sites. It is anticipated that a greater number of dwellings can be delivered across the sites where this can be achieved sustainably. The current permission at Crawley Station Gateway (308 units) and delivery of 185 residential units at 11 The Boulevard (Land North of The Boulevard) indicate that the minimum figure is likely to be exceeded.

Further to this, Local Plan Policy H2 allocates a number of housing sites within or adjacent to the town centre, which will deliver an anticipated 750 units. In practice, sites are delivering

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			<p>a greater amount of housing than the indicative figures identified in the plan.</p> <p>Prior approvals and housing permitted through the more flexible approach to town centre upper floor residential mean that a further 240 dwellings are already in the pipeline, with windfall development continuing to come forward.</p> <p>Policy EC6 is clear that the 499 figure represents a minimum residential delivery across the four Key Opportunity Sites, and housing allocation numbers identified by Local Plan Policy H2 are also clearly identified as indicative. Therefore the policy is considered sufficiently flexible and is clearly not intended to be read as a maximum delivery number. It is not therefore considered necessary to amend the SPD wording in this instance.</p>
		<p>1.35 The SPD recognises that the use of the town centre for residential development in conjunction with other town centre uses may in some instances be at odds with one another. Those sites which have been allocated for residential development in the town centre are located in areas where there are fewer conflicting uses. Given the potential for other existing town centre uses such as</p>	<p>Noted. As stated above, the housing delivery numbers associated with each allocation is indicative, and there is flexibility to deliver a greater amount of residential where this can be achieved sustainably. The NPPF,</p>

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restaurants and bars to cause disturbance to proposed residential occupiers, it is considered that the most appropriate areas in the town centre for residential development are those already allocated in the Local Plan, and these sites should bring forward as many units as possible.

is however clear that town centres should plan positively for residential use, supporting the efficient use of land. Therefore, residential development is encouraged across the town centre provided that the requirements of relevant Local Plan policies are met.

1.36 Paragraph 3.28 of the SPD states that several small-scale residential conversions have taken place in the town centre, which the Council consider to have a positive impact on the town centre. It would be useful if the SPD could advise of the details of these developments, as it would help guide interested parties to understand the type of development which the Council consider to be successful.

Noted. Additional wording has been added to paragraph 3.28 to identify where residential conversions have taken place. However, it is considered inappropriate for the wording to refer to particular schemes as 'good' or 'bad' examples.

1.37 Chapter 4 of the SPD refers to policy EC6 of the Local Plan and in connection with this sets out the general development principles for town centre sites. One of these principles is that town centre sites should, where feasible, maximise opportunities to create jobs to support the local economy. However, it should be noted that not all the allocated town centre sites will be able to do this, or commercial uses may not be appropriate on sites, and therefore a distinction needs to be made. Therefore, we would suggest that this principle is amended to state "create jobs to support the local economy on those sites which have been identified in the Local Plan as appropriate for mixed-use schemes."

Creation of new jobs within the Town Centre is an important aspiration of the Local Plan and the SPD reflects this by encouraging developers to maximise opportunities to do so on Town Centre sites. However, it should be noted that the General Development Principles for Town Centre Sites will be applied 'where feasible and appropriate'. This text is included within the wording as it is recognised that for some town centre sites it may not be feasible to deliver

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			these opportunities. Therefore, amended wording is not considered to be necessary.
		1.38 There are a number of other Sites identified through policy EC6, and site specific guidance on these sites are included in the SPD. In the case of two of these sites planning applications have already been submitted (Central Sussex College and Crawley Station), and in the case of Crawley Station, the development has already been approved. It is questioned therefore whether it is necessary to include this site in the SPD.	The Crawley Station Gateway site benefits from Outline planning permission, with Approval of Reserved Matters still required. The Central Sussex College site has recently obtained planning permission. The SPD covers the Plan period to 2030, and it is considered appropriate to retain design guidance for both sites as development on the sites has not yet commenced. Content of the SPD may be reviewed later in the Plan period as sites are built out.
		1.39 It is noted that site specific guidance is contained in the SPD for a site (Cross Keys), which is not identified through policy EC6 of the Local Plan, and is not identified in any other policy of the Local Plan. It is not considered appropriate for a site to be allocated in the SPD, it has not been subject to appropriate scrutiny and examination.	Noted. A site cannot be allocated through a SPD, and the Cross Keys Site is not an allocation, but is identified in the Local Plan as a Broad Housing Location that is anticipated to come forward in Years 6-10 of the Local Plan. This is clearly stated at para 4.5 of the SPD.  The Cross Keys site has development potential and it is entirely appropriate

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			to provide design guidance/principles to encourage the delivery of this site and help development to enhance the town centre.
		<p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• The SPD refers to the Land North of the Boulevard as a key redevelopment opportunity, and the car park site is also identified as a "Priority Landmark Development Site" within the map contained in the SPD. We agree with this designation and consider that the car park site can offer a significant opportunity to provide much needed housing in this highly sustainable location.</li> <li>• The clarification provided through the SPD regarding residential uses in the town centre and the requirements for justification set out in policy EC2 of the Local Plan is welcomed, and we agree with the Council's approach on this matter.</li> <li>• We agree with the Council's view that the Sussex College Building and Morrisons building should be taken into consideration due to their proximity to the Land North of the Boulevard. However, both of these buildings are not currently shown on the associated map included in the SPD. It is considered that the map should be amended to include these two buildings.</li> <li>• With regards to the key planning and design principles contained in the SPD, we are concerned that a number of these principles are too prescriptive and may act as a barrier to</li> </ul>	Noted. Comments as above.

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		<p>otherwise appropriate development coming forward in this area.</p> <ul style="list-style-type: none"> <li>• We consider that the principle which requires horizontally focused massing and a uniform building line are not appropriate on the Land North of the Boulevard, and this principle may be inappropriately applied to development schemes which come forward in this area.</li> <li>• With this principle in mind, we consider that the advice contained in the SPD is inconsistent given that other principles provide more flexibility on this issue, and are considered at odds with this advice.</li> <li>• One of the key principles sets out that developments located at either side of the Boulevard may be permitted to increase in height, with the proviso that the design is appropriate. We agree with this more flexible approach and support this principle.</li> <li>• The definition of landmark building should not be limited to 'colour palettes, materials and styling'. Height and form should be used to break conventions in the street building line, and this should be referenced in the SPD.</li> <li>• Given the constraints and the potential conflicts of other town centre uses with residential development in the town centre, it is considered that it may be appropriate to allow for increases in the numbers of units that can be accommodated on the allocated sites. These allocated sites are considered the most appropriate areas in the town centre for residential development, and in order to ensure that much needed housing</li> </ul>	
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		<p>targets can be met on the allocated town centre residential sites, these site should bring forward as many units as possible, and reference should be made to this in the SPD.</p>	
Horsham District Council		<p>Thank you for inviting Horsham District Council to comment on the Crawley Town Centre draft Supplementary Planning Document (SPD) as part of the current consultation period, which runs from 27 June to 25 July 2016. We have now had the opportunity to study the consultation document in detail and offer the following comments and observations.</p> <p>It is understood that the SPD has been prepared to support the town centre focused policies (i.e. Policies EC2, EC5, EC6, EC7 and H2) in the Crawley Borough Local Plan: Crawley 2030, adopted on 16 December 2015; and to provide additional advice and guidance in relation to ensuring planning applications are submitted in accordance with the requirements of the Local Plan. Once adopted, this SPD will replace the Town Centre Wide SPD (adopted in May 2009) and also the Town Centre North SPD (adopted February 2011).</p> <p>We support Crawley Borough Council's identification of the town centre as a Key Main Employment Area, in Policy EC2 of the Local Plan, located as it is within the Gatwick Diamond economic area. We also support the strong commitment of the Borough Council to revitalise the town centre, and to build upon Crawley's many positive attributes to enhance the role of the town centre as a great place to live, work and visit (in paragraph 1.2 of the SPD).</p>	Noted and support welcomed.

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		<p>The public realm improvements programmed to take place at Queens Square, estimated at £3.2 million, are also supported (paragraph 3.1 of the SPD).</p> <p>Crawley BC's encouragement of residential development in the town centre - amounting to approximately 1,500 new homes over the next 15 years - is also supported as Horsham District Council is not only meeting our own objectively assessed housing needs but, under the Duty to Cooperate, some of Crawley's unmet need (paragraph 3.2 of the SPD).</p> <p>We support the wording in paragraphs 3.3 and 3.38 of the SPD regarding the prior approval for the conversion of offices to residential use: 'The right to convert offices to residential use through the prior approval process was made permanent by the government on 6 April 2016. Since this date, noise from commercial sources has been included in the process as a reason for refusal. In respect of these elements it is possible to impose conditions to provide mitigation of the effects. It may also be possible to explore residential options further through the planning process, so that appropriate mitigation can be secured by condition' (paragraph 3.3 of the SPD).</p> <p>We support the suggested design guidance and principles for mixed-use schemes (i.e. main town centre uses and/or residential development) at the following sites: Parkside Car Park; Traders Market, High Street; Central Sussex College (East of Tower); and Brittingham House, Orchard Street, identified in Policy EC6. We also support the suggested design guidance and principles for the following Key Opportunity Sites within the Town Centre Boundary, as identified in Policies H2 and EC6 for a minimum cumulative</p>	
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		<p>delivery of 499 net residential units: County Buildings; Telford Place; Crawley Station and Car Parks; and Land North of The Boulevard (Section 4 of the SPD).</p> <p>We support Section 5 of the SPD, which details the circumstances in which the sequential test and impact assessment will be required, and outlines the type of information that will be needed to demonstrate that these tests have been met. The SPD sets out clear guidance for applying the sequential test in Crawley, immediately after paragraph 5.21; and the impact test (i.e. impact assessments) immediately after paragraph 5.30.</p> <p>We support the 'town centre first approach' which is an integral part of the retail policies in the Local Plan and followed through in Section 5 of the SPD.</p> <p>We support the formation of the Town Centre Skills Academy, which is one of the flagship projects identified in the Crawley Employment and Skills Plan 2016-2021, co-ordinated through a partnership between Crawley Borough Council, Construction Industry Trading Board (CITB), and Central Sussex College (set out in Section 6 of the SPD). It is understood that Crawley Borough Council would like to work with developers to bring forward employment and skills plans for town centre sites to maximise the opportunities arising from development and help to coordinate an appropriate level of skills provision (paragraph 6.6 of the SPD).</p> <p>We support the focus on engagement and the importance of pre-application discussions, and the recommendation in the SPD that developers should seek to engage with a range of stakeholders. The SPD goes on helpfully to identify key stakeholder groups that</p>	
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		<p>have a particular interest in the future planning of the town centre (Section 7 of the SPD).</p> <p>I hope that this information is of assistance to you. Should you have any further queries please do not hesitate to contact officers in Strategic Planning on 01403 215398 or by the following email: <a href="mailto:strategic.planning@horsham.gov.uk">strategic.planning@horsham.gov.uk</a></p>	
Central Crawley Conservation Area Advisory Committee (4C's)		At a meeting with the 4Cs Chair and Vice Chair held 26 July, the group advised that it would not be commenting on the draft Town Centre SPD as the document focussed on wider town centre issues rather than specific conservation and heritage matters.	No further action.
Gatwick Airport		<p>Introduction</p> <ul style="list-style-type: none"> <li>• Gatwick Airport Ltd (GAL) has been notified about the above mentioned Town Centre Supplementary Planning Document Consultation.</li> <li>• This note sets out GAL's formal comments as an interested party in this Consultation and as the owner and operator of Gatwick Airport.</li> <li>• GAL's submission to this Consultation is made with particular regard to Crawley Town Centre and building upon its close proximity to the airport.</li> <li>• GAL request to be notified of any amendments made to the Draft Town Centre SPD following the Public Consultation and of the next stages in progressing the Town Centre SPD.</li> </ul> <p>Background Gatwick Airport Limited welcomes the opportunity to comment upon the new Crawley Borough Council Town Centre SPD. Gatwick</p>	Noted.

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		<p>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.</p> <p>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.</p> <p>The Government is currently considering whether Gatwick should be permitted to grow and build a new runway. Expansion at Gatwick would provide an even greater economic boost with a new runway by 2025. It is widely recognised that the local economic benefits would however be appreciated far in advance of a second runway actually opening with many socio economic benefits potentially being realised almost immediately within local communities particularly Crawley.</p> <p>The proximity of the airport to Crawley has had a significant influence upon the shaping of the economy of the Borough having a notable influence upon the socio economic dynamics of Crawley Town Centre and the wider business community. GAL therefore considers it is crucial that we continue to engage in a long term</p>	
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		<p>working partnership with CBC to support the aims of the Draft Town Centre SPD in gaining positive regeneration in Crawley Town Centre and boosting the economic performance of the wider Gatwick Diamond.</p> <p>GAL has been fully engaged in the recent review process of the newly adopted 'Crawley 2030' Local Plan. GAL recognises that the SPD is a planning tool providing the greater planning policy detail for achieving the key principles in sustainable regeneration. The SPD is crucial in aiding the robustness of the policies that are embedded within the new CBC Local Plan which provides the overarching planning policy direction for future development within the Town Centre.</p> <p>The Town Centre SPD will be an important planning tool for achieving sustainable regeneration in Crawley and to facilitate the ambitious revitalisation scheme launched for Crawley Town Centre.</p> <p><b>Gatwick Airport Limited Consultation Comments:</b> In response to the Town Centre Draft SPD Consultation GAL would like to put forward the following comments:</p>	<p>Support for long term engagement regarding Town Centre regeneration is welcomed. The council will continue to work positively with GAL as a key stakeholder and welcomes its support for Town Centre regeneration.</p>
		<p><b><i>Stimulating growth</i></b> 1.1: GAL welcomes the vision CBC have set out for the regeneration of Crawley Town Centre and strongly supports the Town Centre CBC are aspiring to create. GAL are pleased that the Draft SPD has recognised GAL (Section 7 Engagement Para 7.3) as a key stakeholder in the consultation and engagement processes. GAL welcomes the need for proactive engagement opportunities as a means to accelerating the deliverability of sustainable development.</p>	<p>1.1: Noted and support welcomed.</p>

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		<p>1.2 Crawley Town Centre has obvious advantages to build upon and make it further successful. It is in a prime location in terms of its transport networks with good local connectivity and closeness to London and larger centres such as East Croydon and Brighton. GAL recognises that the redevelopment of Crawley Station and the immediate area will present a significant opportunity for regeneration in Crawley bolstering connectivity to the town. Crawley hosts an established business hub at Manor Royal, has a variety of leisure and family entertainment attractions including K2, plus pockets of strong retail such as the County Mall – all of which will benefit from the development of the Station site.</p> <p>1.3: In order to deliver the transformational change set out in the Town Centre Regeneration Programme and the policy guidance within the Local Plan GAL considers that the Council needs to proactively support the policies to deliver greater sustainable growth which is needed within the Crawley Town Centre. The Draft SPD has successfully fulfilled much of this role and CBC should be commended.</p> <p>1.4: GAL believes transformational change could be achieved in the Town Centre by making public space attractive and safe, presenting interesting building design, evolving mixed use development, promoting a stronger retail offer with quality branding within the high street zone and actively seeking to drive upwards local business growth with more opportunity sites becoming available. Stimulating new vibrant markets, enhancing family leisure, developing skills hubs and a more accessible and integrated transport system are also targets which GAL believes are imperative for the Town Centre's successful regeneration. GAL welcomes the significant investment pledged for such regeneration</p>	<p>1.2: Noted and agreed.</p> <p>1.3: Noted and support welcomed.</p> <p>1.4: Noted and support welcomed. A key objective of the SPD is to enhance the role of Crawley town centre as a place people want to visit, work and live in. The SPD therefore builds upon Local Plan Policy EC5 to encourage a range of main town centre uses, and EC6 to provide design guidance that supports the delivery of key town centre sites. It is</p>

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		<p>in Crawley, notably proposals for Queens Square and The Broadway which will significantly improve in the Town Centre. GAL considers that it is important to ensure that there is diversity in the retail offers surrounding the new redevelopment sites such as Queens Square in order to ensure that the vibrancy of the area is maintained. This includes and is supported in the Draft SPD ensuring that town centre commercial floor space is not lost to residential units as there is a risk that areas of the town centre could become quiet footfall zones with such elevated loss of commercial to residential space.</p> <p>1.5: Crawley derives significant benefits from having Gatwick Airport within its catchment as the airport is the main economic driver in the sub region. Crawley receives the socio economic benefits which flow from of having an international airport on its doorstep. Public Sector investment is important for regeneration within a Town Centre but achieving stronger partnerships with the private sector is increasingly important within regeneration programmes. GAL recognises its pivotal role within the Gatwick Diamond and values the need to continue to work closely with CBC to assist in achieving regeneration goals and maximising the potential of Crawley Town Centre.</p> <p>1.6: GAL believes that it should be more clearly recognised within the Draft SPD that Crawley holds such distinct competitive advantages being so close to an international airport. GAL encourages CBC to positively utilise this potential via a strong planning policy platform to direct and shape development in order to gain greater economic buoyancy for the Town Centre. GAL supports the inclusion within the Draft SPD the airports distinct role</p>	<p>envisaged that this approach, when taken alongside wider public realm improvements such as the Queens Square regeneration, will help support Crawley's role as a leading town centre destination with a varied retail-led offer.</p> <p>1.5: Noted. It is recognised that Gatwick Airport and airport-related activities represent a key contributor to Crawley's economy, and also that of the wider Gatwick Diamond. The council will continue to work positively with GAL as a key stakeholder and welcomes its support for Town Centre regeneration.</p> <p>1.6: Noted. As above, it is recognised that Gatwick Airport performs a key economic role, both within a Crawley and Gatwick Diamond context. This is recognised throughout the Local Plan 2015, particularly through the Vision which underpins the plan and which recognises the key role of the Airport</p>

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		<p>as a consultee and the airport's active interest in the regeneration of Crawley</p> <p>1.7: Town centres are vital to maintaining economic productivity of an area and keeping Town Centres vibrant can be a challenge so it is crucial that CBC continually review the SPD and town centre policies to keep the Town Centre bustling, interesting and importantly sustaining a high diverse footfall. There is a recognised need for Crawley Town Centre to strengthen its performance economically in order to attract more inward investment, further new business growth and improve the overall experience of visiting Crawley Town Centre. The provision of new opportunity sites such as County Buildings has the potential to unlock much needed new commercial space within the Town Centre. There needs to be clearer planning policy within the Draft SPD to bring forward attractive and quality commercial sites within the Town Centre and to promote a sustained higher footfall.</p> <p>GAL does support the pragmatic approach presented in the Draft SPD for proposed development which may not be considered as a main town centre use within the NPPF but nonetheless still have the potential to offer value to the town centre economy. As town centres develop there is a need for some flexibility for new development proposals which may not even have previous been an option before the regeneration programme. This also allows for innovation to be realised within a Town Centre - hence is supported by GAL.</p> <p>1.8: GAL considers that the Draft SPD should actively look towards planning policy opportunities to attract high value industries and</p>	<p>in supporting the economic growth of the town. The role of Gatwick Airport is also discussed in the Northern West Sussex Economic Growth Assessment and updates, and through ongoing work being prepared on a cross-authority basis. It is not therefore considered necessary to further reiterate this in the Town Centre SPD.</p> <p>1.7: Noted. The SPD expands upon town centre focussed policies set out in the Local Plan, applying a flexible approach to support a range of main town centre uses, and other uses which support the vitality and viability of the Town Centre over the Plan period. As per the NPPF, the SPD cannot go beyond the requirements of the Local Plan policy, and is not able to provide a more prescriptive policy. It is however considered that the Local Plan and SPD are clear that commercial development will be supported in the town centre over the Plan period, including on the sites allocated within EC6. It is anticipated that the SPD will be reviewed during the Plan period when necessary,</p>

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		<p>technology based services to attain a more comprehensive and modern approach to regeneration and economic growth in Crawley.</p> <p>1.9: Town Centres clearly need to be competitive in order to function well economically and a fundamental goal of the Draft SPD must be to improve Crawley's competitiveness. The various strategies and policies that the Draft SPD will adopt to specifically achieve this elevated level of competitiveness need to be made more transparent in the Consultation document. The development of Town Centre Action Plans for example which could be reviewed and monitored would support this.</p> <p>1.10: Town Centre Regeneration requires forward thinking and innovation to gain distinct competitive edge. In GAL's view CBC need to specifically look outwards at other competing Retail Core Centres and work to establish not only advantages within their own centres but also to develop positive linkages with other performing Retail Centres such as Brighton. This proactive approach would allow for complimentary economic activity to precipitate and contribute towards stimulating wider economic development corridors. The pooling of resources and strategic opportunities can work to deliver regeneration ambitions which would otherwise be harder to achieve without such complementary retail policy approaches being adopted. GAL believe CBC could work further with East Croydon Borough Council and Brighton &amp; Hove Council to address the retail offer and the intelligent mix of retail strategies which could accelerate the town centre retail success of Crawley.</p> <p>1.11: GAL considers that the role of the Draft SPD in supporting the Local Plan Policy EC7 (Retail and Leisure Development outside the Primary Shopping Area) is of particular interest. The policy sets out</p>	<p>particularly as existing sites will over time be built out and new opportunity sites may come forward.</p> <p>1.8: The overall economic approach of the Local Plan is to support sustainable economic growth across the borough, including the town centre and other main employment areas. The Local Plan does not seek to prescribe the type of growth to be delivered, though specific growth sectors and needs are identified in the Economic Growth Assessment (2014).</p> <p>1.9 &amp; 1.10: Noted. The Local Plan and Town Centre SPD seek to provide a flexible land use planning policy framework to support Crawley's growth as a competitive town centre through the planning process. The SPD expands upon the Local Plan policies to assist in their interpretation, but cannot introduce new policies.</p> <p>The council has embarked upon an ambitious Town Centre Regeneration Programme, which identifies key regeneration projects, beginning with</p>

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		<p>when impacts tests are needed for retail development outside the town centre. GAL considers that it would be appropriate given the unusual circumstance of CBC having an international airport within its catchment that Section 5 also acknowledges the important role that retail development also fulfils at Gatwick Airport. Para 5.13 for example acknowledges two existing out of centre retail parks in Crawley i.e. County Oak and London Road. GAL considers that it would be appropriate for the Draft SPD to also acknowledge the unique role and special circumstances of Gatwick Airport in providing retail facilities for passengers as part of the offer that is now expected and customary at international airports and regarded as part of the overall passenger experience when travelling. GAL considers that it would be appropriate within the Draft SPD to acknowledge in Section 5 of that the Council would not expect the "sequential" and/or "impact" tests to be necessary for development of retail facilities at the airport, given that their primary purpose is to provide facilities for the actual airport passenger. GAL believes this to be an important point for inclusion within the Draft SPD. The document needs in GALs view to recognise and highlight those retail facilities are key to the success and attractiveness of airports.</p>	<p>the public realm improvements at Queens Square. The council has also made a number of key appointments to its Economic Development team, which is working positively with organisations and stakeholders within the town and across the sub-region to promote economic growth and skills development. These ideas will be of interest to CBC's Regeneration and Economic Development team.</p> <p>1.11: Noted. It is acknowledged that a range of main town centre uses are often present within airports. The Local Plan identifies both County Oak and London Road as out-of-centre retail locations, but does not allocate these as formal centres within the retail hierarchy, and both sequential and impact testing should be satisfied where retail is proposed in these locations. It is agreed that the presence of additional retail that is situated airside, and is therefore not accessible to the wider public, would be unlikely to have a significant negative impact on the health of the town centre, and where this is proposed it may be appropriate to</p>

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			apply a more flexible approach to both sequential and impact testing. If new non-airside main town centre uses are proposed at the airport, the impact of these on town centre vitality and viability would need to be carefully considered. The sequential and impact tests are requirements of the NPPF and Local Plan, and neither document contains exemption that would allow these tests to be by-passed. Given that main town centre uses which are located airside are unlikely to have a significant negative impact on the town centre, it is accepted that the test may be applied more flexibly in these instances, and additional wording is added to this effect. However, in the interests of promoting a healthy town centre, both tests will be applied where required.
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		<p><b><i>Improving Connectivity</i></b>                      2.0: The quality and type of surface access and overall connectivity of the Town Centre is a crucial factor in its success and is therefore core to the regeneration programme. For the SPD to add to boosting the economic performance of Crawley GAL believes the investment in new transport infrastructure and improving the efficiency of existing networks must be a high priority for CBC and WSCC and cross referenced in the Draft SPD. Crawley has</p>	2.0-2.3: The council is working with the key partners including West Sussex County Council and other stakeholders to bring forward a number of key regeneration and transport infrastructure projects across Crawley, utilising Coast to Capital Local Enterprise Partnership
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		<p>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 improving Gatwick Airport Rail Station and this will improve the connectivity to key destinations. This exciting modern rail /airport interchange could also be utilised by CBC to further raise tourism, attract employment and commercial investment to Crawley Town Centre as part of the proposed wider regeneration scheme. GAL believes that this should be acknowledged within the Draft SPD and the need for further utilisation of directional planning in the Draft SPD to ensure that the development of Gatwick Station is joined up with the redevelopment and longer term ambitions for the new Crawley Station.</p> <p>2.1: As Crawley has the international gateway Gatwick Airport on its doorstep this significantly pushes up the potential for Crawley to access further international opportunities and the more globalised marketplace. The latter is an opportunity GAL considers CBC could wholly exploit and integrate into the Draft SPD. Connectivity is absolutely crucial to the success of a modern Town Centre and Crawley has competitive advantages which it should fully harness. GAL considers that the ability to access the wider international markets from utilising the economic potential of the airport can only make a positive contribution to the regeneration of Crawley – and the Station regeneration scheme could help to harness this connectivity to the airport and it would therefore be valuable to note within the Draft SPD.</p> <p>2.2: The Draft SPD has recognised the need for the Centre to be a good environment for pedestrians. Creating a more walkable Town</p>	<p>Local Growth Funds. This includes schemes to improve public realm, sustainable transport connectivity and public transport interchange facilities, (including Crawley Station Gateway public transport interchange)</p> <p>Improvements to Gatwick Airport railway station are welcomed, and alongside planned regeneration at Crawley Station Gateway public transport interchange, connectivity by sustainable transport means will be greatly improved.</p> <p>As noted, the SPD recognises a need to improve pedestrian connectivity in the town centre. Key improvements in the pipeline include improvements to the public realm at Queens Square and Queensway, and regeneration of the Crawley Station Gateway public transport interchange. Improving links between different areas of the town is identified as a key general development principle in Section 4 of the SPD, and site specific design guidance for town centre opportunity sites focusses on reinforcing the public realm and improving pedestrian legibility through careful planning to</p>

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		<p>centre will increase footfall, which is a key factor for regeneration. Crawley Town Centre has a good level of accessibility but is notably disjointed with pockets of uses which could be complementary and be further economically productive if these areas simply had greater connectivity. A modern sustainable Town Centre requires development integrated with good pedestrian and cyclist routes, and efficient public transport. GAL welcomes The Station Gateway proposal which could serve well in facilitating unlocking the development potential and what is key is the need for a more pedestrian friendly setting surrounding the new station development.</p> <p>2.3: Improved pedestrian and public transport options in Crawley will not only encourage greater footfall but also promote a lower carbon Town Centre and contribute towards improving air quality which are essential features of sustainable growth and promoting Town Centre living . The Draft SDP does need to further flag the importance of supporting policy improving the pedestrian connectivity within the Town Centre.</p>	<p>encourage active frontages and promote sustainable movement across the town centre. Local Growth Fund bids will be prepared to support these improvements.</p>
		<p><b><i>Growing Knowledge &amp; Business</i></b>            3.0: The need to continually innovate and improve existing service and knowledge based industries sustains regeneration. Crawley benefits from a strong education base with Sussex College located within the Town Centre and further connections throughout the region with other educational facilities and universities. Crawley already has technology and research based local businesses and needs to further attract businesses which provide innovation. This means that there needs to be the premises and opportunities made available to allow such business to expand and relocate to</p>	<p>3.0: Noted and support welcomed. Skills development is a key corporate objective for the council, which is being prioritised through the Crawley Employment and Skills Plan and through joint working initiatives such as the Town Centre Skills Academy. Support from local employers such as GAL is vital in supporting skills development in Crawley, and the</p>

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		<p>Crawley. The Draft SPD is a key policy document which can provide a planning mechanism which can contribute towards the achievement of this. In parallel Crawley will also need to attract skilled workers to support these businesses and further raise the employment profile of Crawley Town Centre. Section 6 of the Draft SPD is welcomed by GAL as a local skilled workforce and greater access to local employment opportunities within Crawley are a positive denominator in the buoyancy of the immediate economy. GAL strongly supports the objectives of the Skills Academy and this is a project which GAL is actively supporting and thus we would welcome an acknowledgement of this within Section 6 of the Draft SPD.</p> <p>3.1: In conjunction with expanding and addressing the employment profile in the Town Centre the Draft SPD must be cross referenced to planning policy which looks at providing high quality but affordable homes. Telford Place in particular offers a good town centre windfall opportunity to achieve a mixed use zone. Town Centre living is becoming more popular but family housing within the Town Centre is still limited. Raising the availability of living accommodation near to the workplace is important in terms of sustainable development in Town Centres. Live-work units could be more actively encouraged and appropriate Town Centre housing could be developed in suitable locations (e.g. – areas that are not within industrial areas or the airport safeguarded zone). Conversely there cannot be the loss of valuable commercial space from the Town Centre to housing. GAL recognises that CBC has attained an Article 4 for the Manor Royal Employment District which is positive for the business community. It is important that key office, commercial and retail space is not depleted from the Town Centre</p>	<p>contribution made by all businesses is valued. However, given the valuable contribution made by many different businesses to skills development in Crawley, it is not felt to be appropriate to single out an individual employer in the SPD.</p> <p>3.1: The delivery of a range of new homes in Crawley is a key Local Plan objective, and the Plan identifies that a minimum of 5,000 new homes will be delivered in Crawley, including 1,500 in the town centre, over the Plan period to 2030 of which 40% should be affordable. The Town Centre SPD seeks to expand upon the town centre focussed policies of the Local Plan, and should be read alongside the Local Plan. It is not therefore considered necessary to cross reference to affordable housing policies.</p> <p>Support for the Manor Royal Article 4 Directions is welcomed. It is however recognised that the town centre is a sustainable location for residential development, and the Local Plan and Town Centre SPD are supportive of main town centre uses and residential</p>

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		<p>as such stock is essential to maintaining a thriving Town Centre and the much needed footfall would be lost with the potential for town centre voids.</p> <p>Importantly is also crucial that Commercial Town Centre units are not lost to residential development via the prior consent planning process. GAL welcomes Paras 2.8/2.9/3.19/3.20 and the recognition that the much needed employment space could be lost within the Town Centre to residential conversion via the Prior Approval process and hence there needs to be a mechanism to control the loss of employment space in the Town Centre. GAL requests that the Draft SPD also notes that this loss of commercial space to residential use also has the potential to create concerns relating to exposure to unacceptable levels of aircraft noise for the new residents/users of the converted premises. This is particularly important to highlight if the converted residential unit has not been developed with effective noise insulation and ventilation because Prior Approval consent has not required the integration of noise mitigation measures as a condition of the development.</p> <p>GAL considers that this should be recognised in the Draft SPD to flag to both project developers and potential residents of new domestic units that aircraft noise exposure levels should be investigated prior to conversion/occupation respectively.</p> <p>The situation is similar for the loss - via the permitted development and prior consent mechanism - of commercial units to residential units within the 'Safeguarded Land Area'. The Safeguarded Land is protected by both National and Local Planning Policy for a potential</p>	<p>in the town centre and it is not, therefore, considered appropriate to seek an Article 4 in the Town Centre. It is recognised that the right to convert offices to residential use through prior approval has now been made permanent by the Government. Commercial noise is now a consideration in the prior approval process, and Section 3 of the SPD encourages developers to have regard to, and mitigate, the impact of noise through the design process. Noise from transport sources, including aviation, is not at present a factor that can be considered as part of the prior approval determination process</p> <p>The concern of GAL regarding aircraft noise is noted. However, the focus of this SPD is Crawley Town Centre, where aircraft noise exposure is well beneath the 57dB noise contour<sup>2</sup> for a second runway which marks the Significant Observed Effect Level at which noise can start to cause small changes in behaviour or attitude.</p>

<sup>2</sup> 2 runway scenario, based on ERCD report 0308, published by CAA (2003).

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second runway to be realised at Gatwick Airport and as such new development which would compromise bringing forward and the timely delivery of such a nationally significant scheme must not be permitted. However by virtue of the prior consent planning instrument a planning application may not be required for residential conversion within the Safeguarded Land Area. This could give rise to poor quality Town Centre development patterns or shorter time horizons for occupancy unless planning policy was supported to prohibit such loss of valuable commercial space to residential use within the safeguarded land, and to support high quality Town Centre residential development in more appropriate locations. GAL feels this point needs to be clearly flagged within the Draft SPD to inform developers, businesses and the wider local community of the potential risks for development within the Safeguarded Land. Therefore in response to Question 2 GAL considers that matters of exposure to aircraft noise and development within the Safeguarded Land via the Prior Approval process and controlling the loss of commercial floor space need to be made clear within the Draft SPD.

The council share the concerns of GAL regarding the change of use to residential through prior approval within the safeguarded land. However, this land is all to the north of the built up area boundary, well way from the Town Centre and it is not appropriate for the Town Centre SPD to refer to these issues.

**Public Realm Improvements**  
4.0: The public image of the Town Centre is greatly influenced by the quality of the public realm. The promotion of high quality buildings, mixed use developments and attractive public spaces GAL believes is an important goal for successfully delivering vibrancy in a Town Centre. GAL commends the recognition within the SPD of the need for public realm improvements in Crawley and the significant investment pledged to improve the public realm. The visitor experience can positively impact upon economic regeneration and enhanced footfall can be achieved by simply

4.0: Noted and support welcomed. The SPD recognises the importance of planning positively to help address concerns about anti-social behaviour. By introducing a residential population into the town centre, evening activity will be increased, enhancing natural surveillance, and the SPD provides practical design advice to encourage carefully planned development that

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		<p>making it a more attractive place to spend recreational time. The Draft SPD does recognise the high volume of visitors Crawley receives and need for the wider the policy strategy to capture this market opportunity to potentially enhance the economic performance of the Town Centre. Improving the public realm can greatly increase dwell time and add to town centre vibrancy. GAL acknowledges that as part of working toward this overall goal the significant improvements proposed to Queens Square will undoubtedly secure regeneration activity within Crawley Town Centre. The Draft SPD needs in GALs view to further highlight how the quality of the public realm may be improved by tackling the perception of anti-social behaviour to induce a greater utilisation of the public space available via various planning mechanisms - for example within the Memorial Gardens which otherwise offers a valuable green space opportunity site adjacent to the core retail area.</p>	<p>promotes safety. Public realm improvements which are coming forward through the Town Centre Regeneration Programme will further help to promote safety and reduce fear of crime.</p>
		<p><b>Summary</b>                      GAL fully supports the ambitions of the Crawley Borough Council Draft SPD. GAL does wish to commend CBC on the production of such a comprehensive Draft SPD for the Town Centre. GAL has put forward constructive comments as part of the Consultation in order to feed into the development of a robust planning tool for Crawley. GAL will to continue to work alongside CBC to explore how we can further support the delivery of the Draft SPD and facilitate in making Crawley Town Centre a destination of choice for retail, commercial investment and employment and as an attractive place to study, visit and live.</p>	<p>Noted and support welcomed.</p>

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		If you have any further queries or would like to discuss the GAL comments further please do not hesitate to contact me.	
Mr Colin Maughan		Thank you for telling me about this recent addition to the council's Local Plan 2015 – 2030. It came at a time when I am busier than usual so my comments might be less well considered than usual – I hope not.	
	Paragraph 1.1	Mention of the heavy use and importance of the bus station reminds me of its poverty stricken, tired appearance and its unsatisfactory design, which I have discussed in more detail in my previous letters. Buying street furniture and materials from Marshall's catalogue is bound to produce a poor standard of urban infrastructure. Aiming for cheapness and mediocrity can seldom bring good results. Short life components cost more in the long run.	Noted. It is anticipated that public realm improvements at Crawley Station Gateway public transport interchange will help regenerate this key gateway to the town centre. The SPD is not able to provide guidance on the suppliers of materials.
	Paragraph 1.4	"the" missing after "reduce" on fourth line.	Noted. Text amended.
	Paragraph 1.5	Line 6: "well designed new homes" is nearly meaningless these days, and reminds me of politicians talking about "hard working people" at a time when their policies are continually destroying jobs and the opportunity to work hard.  The big developers, like Barratts, are much more concerned with making profits by raising land values by building homes to unacceptably low standards on greenfield sites. Providing good homes and communities is low down on their list of priorities. The housing schemes like mine here in Shrublands and Forestfield, and PRP's scheme at the Ryde in Lewes are still streets ahead of	Noted. The requirement for good design is identified in the NPPF, though it is appreciated that design can be a subjective issue. The council has provided site specific design guidance in the SPD to help guide development on key town centre sites and ensure that it comes forward in a well-designed manner. The council employs an Urban Design Officer whose role is to provide feedback to

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		anything built since. The houses designed by Eric Lyons for the developer Span are as good as new after 50 years, and unaltered. In my experience, big companies, especially when they have a monopoly, seldom provide a good service.	developers and help shape the design of proposals to ensure that development is well planned.
	Paragraph 1.8	"... the town centre as a sustainable location to live, work, visit and enjoy". I agree with this, but sitting back and allowing supermarkets and shopping malls to suck the life out of towns is detrimental to these aims. Like the council, at the present I am seldom if ever in favour of a laissez-faire policy like our present government, who are strongly, misguidedly anti- planning. The trouble is that planners often make short-term decisions like building inner-ring roads and bringing in half baked policies giving cyclists priority over motorists and pedestrians. Even giving pedestrians 100% priority doesn't work well in most urban areas.	Noted.
	Paragraph 1.14	Line 5 "Through good design..." As a designer I should warn you that good design is the work of good designers, and there are hardly any good designers around. For many years I worked as the only designer in various companies and organisations, and this is not recommended. A design team of two or more good designers usually does better work, and survives better than a lone designer, who nobody understands or appreciates.  It is also important to have a good designer involved when finding outside design firms, and assessing their work. Judging by the urban sculptures, and the Queens Square Regeneration scheme, this isn't working well in Crawley Council. sometimes schemes become modified, and improved, once the work progresses. I could be wrong about Queens Square, but moving the sculpture and the	Noted.  With regards design, response is as per para 1.5.  The Queens Square improvements have been designed in liaison with the council, and have been subject to public consultation which has helped to identify the preferred scheme. In order to help regenerate Queens Square it has been necessary to relocate the Martlets sculpture to the library, with the bandstand currently in

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		<p>bandstand to give a clear site is an unpromising start. Making things easy for developers and designers is not usually wise. Also, you need to know the companies you employ very well. The company who are doing Queens Square have ruined Leicester Square – although not beyond repair. I doubt if <u>they</u> are “good designers”!</p> <p>The mention of conflicting uses like residential and commercial categories is most welcome. The zoning that planners have imposed for many years has greatly diminished the character of urban Britain. Close examination of old photographs, or a visit to Finland for example, will show how much the vitality and interest can be improved when people <u>live</u> in the centre, and there is some industry nearby. The New Town designers’ work was remarkable in this respect of building industrial estates on one side of the service roads behind the neighbourhood shopping parades for instance.</p> <p>The difficulties of making this work are considerable, but well known. I used to stay in a flat over a bakery that worked 24 hours, and a house that had a busy railway line at the bottom of the garden, also operating 24 hours a day; to mention only two examples that come to mind.</p>	<p>storage prior to its restoration and relocation in Memorial Gardens.</p> <p>Support for guidance to help manage the scope for conflict between different uses in the town centre is welcomed.</p>
	Paragraph 2.4	<p>Economic growth in the town centre. Looking at the plan a number of important questions come to mind:</p> <p>a) Can anything be done to rescue the Old Town/Village High Street for serious shopping? I always think of Faversham – a marvellously good town – where due to the decline of its industries (Thames sailing barges, gunpowder industry and</p>	<p>a.) Noted. National Planning Policy (NPPF) requires the council to promote a range of main town centre uses, and shops can now be converted to other uses, including A2, and subject to certain requirements, A3 or residential use without planning</p>

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		<p>breweries) a large part of the shopping centre has turned into private houses (retaining their good shopfronts).</p> <p>b) Can the Broadway be returned to a primary shopping area, in spite of its competition with County Mall?</p> <p>c) Is the formerly important, handsome southern end of the High Street on the south side of the railway level crossing going to be lost as part of the vibrant centre? Please keep the iron pedestrian railway bridge.</p> <p>d) I don't think I have found any recognition of the trend for more specialist retailers such as cycle shops, militaria and tool shops to move to the industrial estates. They probably do this because they serve trade customers rather than the shopping public, and access by commercial vehicles to their doors is more convenient. I am pleased they are still here if someone tells me, but their absence from the centre is damaging, and builders' merchants are dubious about helping me because I don't always want to have a lorryload of materials when doing small jobs at home. When the New Town was built, the industrial estates had up-to-date signs listing the companies operating on those sites. How to provide a modern version in a town when traffic volumes and <u>speeds</u> make this method of giving information difficult. The Hastings industrial estates are better in this respect. They do have lists of companies.</p>	<p>permission. Whilst it is possible to identify Primary Shopping Frontages where retail is concentrated, the High Street does not fit this description as it is more focussed on restaurants and alternative town centre uses which perform an important role in enhancing the daytime and evening economy and contributing to the range of uses in the town centre. The policy does of course enable retail uses to locate in the High Street, but retailers are choosing to locate elsewhere in the town centre.</p> <p>b.) The Broadway is an area which has in recent years experienced a number of long-term vacancies. In order to encourage the take-up of units, the area is identified as falling within the Secondary Shopping Frontage which allows for a greater range of uses. As for the High Street, retail uses are encouraged, and we are increasingly seeing a greater take up of units for retail use.</p> <p>c.) Condition 7 of outline planning permission CR/2016/0294/OUT</p>

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			<p>requires developers to undertake a full structural survey of the bridge and assess options to retain as part of the Crawley Station Gateway improvements.</p> <p>d.) Noted. The council does not encourage retailers outside of the town centre and neighbourhood centres, as it is important to direct such uses to the town centre before other less central locations are considered. Many of the more specialist retailers in Crawley tend to locate in the neighbourhood parades where rents are lower than town centre locations.</p>
	Paragraph 2.5	I agree with this but almost daily I am told that the rents and rates in Crawley, especially in County Mall, are unduly high. I know there is <u>some</u> truth in this, but I think it should be openly discussed. Is it true? And if so why? What can be done, if it <u>is</u> true?	Noted. This is not a planning matter and cannot be addressed through the SPD.
	Paragraph 2.6	"warehouse clubs" are mentioned, and I don't know what they are.	The definition of main town centre uses set out at 2.5 is taken from the NPPF. In general terms, a warehouse club would be taken to represent a retail use where membership is

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			required in order to purchase from the store in question
	Paragraph 2.7, page 11	<p>Second grey panel: "Contributing to a balanced range of uses in the town centre". Urban planning departments used to try to avoid having too many similar businesses in one street – restaurants or coffee bars, or charity shops, for instance. I'm not sure if they have this luxury now, when supermarkets and the internet have decimated shops everywhere. Also, it might be good to have a "restaurant area" or a "gun quarter" (as in Birmingham) as there is something to be said for a) competition between adjacent businesses, and b) cooperation between them if they trade with one another.</p> <p>"Reducing vacancies and promoting active frontages". In spite of the conversion of some space above shops into flats there still seems to be a lot of empty or half empty space above them in the centre. This is a waste of accommodation and suggests that there is a problem with rents and rates – are they sometimes too low? I think the aim should be to have a minimum of redundant space. Sometimes this is a design problem because the access to first and second floors can only be gained by entry through a shop, or at the back in an area people would be afraid to use at night (I have read 2.11).</p>	<p>The NPPF requires councils to take a positive approach that supports <u>all</u> main town centre uses within the town centre. Local Plan Policy EC5 does enable some clustering, supporting a concentration of retail uses in the Primary Shopping Frontages which includes County Mall, The Martlets and Queens Square. Equally, a more flexible approach of the Secondary has tended to result in a clustering of restaurant and other non-retail uses in the High Street. The SPD does seek to encourage specific quarters on some of the key development sites, but this is not intended to be applied prescriptively and it may be that other uses are appropriate.</p> <p>The SPD does seek to pro-actively encourage the use of upper floors for commercial, residential and community use, and provides practical design advice to help achieve this in a way that has regard to the presence of other nearby uses.</p>

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	Paragraph 2.8	The provision of more living accommodation in the town centre should benefit the shopkeepers and avoid some of the problems that come with private car use. And good bus services make travel to local industry practical, if people use it. as with the poor quality of the bus station the bad design of contemporary bus interiors, the unduly hard tyre pressures (100+ psi), the lack of bus shelters all over the town, and the bad condition of roads doesn't do much to increase passenger use. Bus seats are too close together and the provision of space for pushchairs, for mothers and wheelchairs could be improved. More passengers = fewer car journeys, and a reduction in car speeds might encourage more people to ride their bikes to work, as in Holland. Can experimental measures be tried sometimes?	Noted and support welcomed. The Local Plan and SPD recognise that the town centre benefits from a good range of facilities, services and access to sustainable transport, and is an appropriate location for residential development. Bus shelters, interiors and seats are not a planning issue and cannot be addressed through the SPD.
	Paragraph 3.1	I have already commented more than once on the Queens Square scheme. What is there now is good, but worn and scruffy, but could probably have been repaired for much less than £3.2million. The loss of the canopy on the old Tesco's store is another example of the "death by a thousand blows" destruction of a conservation area piece by piece, so common in Britain, but not in other countries where tradition and pleasure in the familiar are valued in spite of developers' relish for demolition anything old. We are all aware that the architects and developers who destroy our towns for profit, themselves, live in immaculate conservation areas in large 18 <sup>th</sup> century houses.	Noted. The council has identified the regeneration of Queens Square as a key corporate objective that will help to ensure the town is able to retain its position as a place that people want to visit, work and live in.  The removal of the canopies was carefully considered, particularly as they formed part of the original new town layout around Queens Square (although it is not a conservation area) and provide cover for people during inclement weather. However, the quality of these canopies had deteriorated, and they were at a lower

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			height than other canopies along Queens Square which are more integrated and read as a continuous feature. They were not, therefore considered to be of the same architectural merit as others in the town centre, and it was considered their removal would bring about an overall improvement to the shop unit(s) that would reinstate the building as an anchor store, their removal was felt on balance to be justified.
	Paragraphs 3.3 and 3.4	3.3 and 3.4 are very sound comments on the current situation. A change of Chancellor or the Exchequer may prevent the ship from sinking if some money can be spent.	Noted.
	Paragraph 3.8	Diversity in the use of the ground floor and first floor in shopping areas. Unfortunately, the public is poorly educated and informed and also selfish. Cafes and restaurants have to face the fact that the quality of food and service is less important to customers than the price. They prefer to eat out of cardboard boxes than use plates and haven't been taught how to use knives, forks and chopsticks in spite of spending many years in state education. A cynic might say people get the town they deserve, and counting footfall just as the media count the ratings for soaps, the Antique Road Shows and so on, is by no means encouraging. Unfortunately it probably isn't up to councils to discourage lower common denomination trends, but it could end in tears. I used to complain to the manager of the cinema	Noted. Although the council is able to encourage a range of main town centre uses, the decision as to whether a business wishes to locate in the town is ultimately one that will be decided by the market.

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		<p>about the films he showed being commercial rubbish, which he was well aware of, but the cinema still failed. And the same applies to our two shops selling films. Good films sell for 50p, or don't sell, and people pay £18 for rubbishy, unduly violent films usually from America.</p> <p>As far as I know, the NHS walk in centre failed because people misused it. Unfortunately, we have to be realistic, and often what we would like to happen, or like work well, doesn't due to human behaviour and stupidity.</p>	
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Paragraph 3.9	<p>The mention of opening hours reminds me that there is a problem of safety of the public and shopworkers after closing hours. For instance several people I know in shops and houses in West Green are afraid to be on the street after 5 or 6pm in the evening. I have, incidentally, been threatened twice in walking home from Three Bridges Station later in the evening, but I expect this could happen anywhere in the country. It is however, very unsettling and damaging to people's loyalty to their home town and environment (see your 3.28)</p>	<p>The SPD recognises the importance of planning positively to help address concerns about anti-social behaviour. By introducing a residential population into the town centre, evening activity will be increased, enhancing natural surveillance, and the SPD provides practical design advice to encourage carefully planned development that promotes safety. Public realm improvements which are coming forward through the Town Centre Regeneration Programme will further help to promote safety and reduce fear of crime.</p>
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Paragraph 3.10	<p>Line 8. Some examples of the types of secondary shops might make the meaning of this clearer and I don't understand what "... recreation offer" means.</p>	<p>The Secondary Shopping Frontages relate to the more peripheral areas of the town centre where there is</p>
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			typically less pedestrian footfall and a greater amount of vacant units, for example The Boulevard, Broadway and Broad Walk. Recreation offer is a broad terms which can refer to leisure uses such as restaurants, drinking establishments and cultural uses such as museums or galleries.
	Paragraph 3.13	"... an economic statement..." I agree with this but I wonder whether small shopkeepers, especially if newly arrived from Pakistan or Poland might not be deterred by demands that we can take in our stride. Perhaps Crawley Council has staff who can help people with British bureaucracy, but it wouldn't be good to underestimate the challenge that starting and running a business in a shop presents people with, especially the employment of staff. I'm afraid I often nag shopkeepers to use their neighbours' services. In spite of knowing that empty shops next door are bad for business they are often reluctant to have a haircut or buy a coffee in neighbouring shops, to keep the economy going.	Noted and support welcomed. The council offers support to assist people who do not use English as a first language.
	Paragraph 3.18c	"Kitchen Noise and Odours" would be improved if it read "Kitchen noise and odours", as would the last line if it read.... noise and odour..."	Noted. Text amended.
	Paragraph 3.21	In the recent past I have grumbled about the specification of stainless steel seating. It is too aggressively shiny, and cold and wet in winter, and the pedestals supporting the seats are much too long unless tall Dutch people come to use them – sitting with your feet off the ground isn't comfortable. Some German public seating	Noted. The SPD does not specify materials. This is not a planning matter and cannot be considered through the SPD.

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		is designed to dry quickly after rain. In winter, I take old newspapers to sit on when using your horrible stainless steel seats.	
	Paragraphs 3.24, 3.25 and 3.26	<p>I agree with this, and it reminds me that the building in Haslett Avenue West – a sound concrete system three or four storey block designed by a retired Polish Crawley Borough Council architect has always been intimidatingly severe. It reminds me, whenever I go to the bus station, of the grim Russian buildings in East Germany and I wouldn't want to have a shop or office in it.</p> <p>This townscape issue is mentioned in the last paragraph in the grey panel in 3.26. And it applies to the proposed new buildings in the Broadway (opposite St John's Church) and the blocks of flats on Crawley Railway Station site, both of which have rather heavy-handed commercial looking façade designs. It is a question of rather more sophisticated design and detailing by a better architect rather than off the shelf design as found on computer programmes.</p> <p>Although "townscape" is mentioned here I don't think "skyline" has. At the moment, the view from the Old High Street down Ifield Road is unsatisfactory the skylines in Crawley are quite good. I have just returned from Sheffield, where it has been ruined, and in London, as a result of the advisor to the Mayor Richard Rogers' changing his mind, the skyline, including around St Paul's, is being devastated. There is a campaign to save it, but nobody is listening.</p>	Noted. The height of development proposals will of course vary of a case-by-case basis. Some locations may be appropriate for taller buildings whilst in other locations a reduced building height may be more appropriate. The height of town centre buildings is also constrained by the need to have regard to Gatwick Airport Aerodrome Safeguarding.
	Paragraphs 3.28 and 3.29	This is all very sound, but can it be implemented satisfactorily? I live in a conservation area where everyone has been allowed to alter all the houses – <u>thank goodness Crawley Borough Council didn't agree to all the garden walls being removed.</u> I often think my neighbours are mad when they alter their houses, but they are	Noted. The Town Centre Regeneration Programme includes improvement of wayfaring in the town centre. The materials and design of street name plate signs are not a

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simply sheeplike, ignorant and selfish, in spite of living in a "housing association". And the work of unskilled tradesmen made a bad situation worse.

Another issue which I don't think has been mentioned so far, is street shop and house signing. All over Britain now this is a neglected area and identifying roads and buildings due to the lack of signs is seriously difficult and getting worse. It isn't too bad in Crawley, and the colour coding of neighbourhood signs is good. In the New Town centre the street signs are clear and handsome, although they look older than the buildings in their design. They are probably made in cast iron or aluminium and probably need repainting from time to time. But more recent street signs on plastic, with aluminium square section legs are horrific. It looks as though someone in the council has given the signmakers a freehand with the choice of faces, their size and spacing. The days of signmakers knowing their job in this respect have long gone, and the signs in this conservation area are shameful. Even if there is never going to be a standard design specification a simple rule would improve them: equal spaces all round based on the height of capital letters\* NB: image provided within the letter.

Fortunately, I was asked to design the name sign for Ifield watermills and I gave the restorers a choice of two. The relative size of letter is important.

At the beginning of this letter I said there are very few good designers or architects, and similarly, the specification of lettering is a black art. Cambridge has road signs designed to be read at an angle by drivers in moving cars.

planning matter and cannot be considered through this SPD.

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	Paragraph 3.29	<p>In 3.29 smells are mentioned. I have rarely noticed bad smells in Crawley. The soap shop in the Martlets is very off-putting, along with the garish colours, and always reminds me that it is impossible to buy good quality soap in Crawley now. I have to get it from friends in France or Germany. Some positive smells would be pleasant. The coffee shops don't smell or taste of coffee for some reason, and garages no longer smell good. There probably isn't much you can do about this loss though. I expect that bad food smells are made by bad food. As with other animals and insects, our noses are important to our welfare and survival.</p> <p>It doesn't seem to come under this heading, but it needs to be said that there isn't at present enough attention to detail in the conversation areas in the Old Town or the New Town. Nearly all the windows that have been replaced have been done carelessly. Plastic frames are usually used because they are dirt cheap and don't need painting. If you look at old photographs of the High Street south of The George Inn the numbers of window panes have been increased, and in the Broadway all the Crittall windows have been discarded in the offices over the betting shop. These are changes made in order to suit the builders, and make work for them. On the old Tesco shop in Queens Square the good and probably original window frames on the ground floor were beautifully repainted, and then replaced with the unsatisfactory grey painted aluminium ones which don't blend in with the handsome anodised aluminium ones on the floors above. These need to be carefully cleaned without damaging the anodizing, which is still quite good. Use soap and water and fairly soft bristle brushes. Some have been cleaned already, but most of the frames are still dirty. This is a very pleasing building, and the owners and</p>	<p>Noted. Further design guidance on shopfronts and signage is provided in the Urban Design SPD, which is cross-referenced in the Town Centre SPD. The council will also be working with Central Crawley Conservation Area Advisory Committee to update Conservation Area Statements for the High Street, Dyers Almshouses, St Peters and Sunnymead. Additional text has been added to the Town Centre SPD to cross-reference the High Street Conservation Area Statement, which is a material consideration for new/replacement shop fronts in the High Street Conservation Area.</p>
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		<p>shopkeepers should be required to make the best of it. Shame about the lost canopies though.</p> <p>If more care had been taken of the High Street and the New Town centre it would be a showpiece, but it is still not being watched carefully enough. In St Leonards-on-Sea one man from the council is always on the street, and builders and shopkeepers are a bit afraid of him. The results in a town almost in ruins are amazing. It has taken ten years or so to turn the built environment, including interiors, around. In Germany, especially Berlin where the whole city has been repaired from top to bottom, including all railway and underground stations. The achievement is quite amazing. People love living there and visiting the city.</p>	
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Paragraph 3.34	<p>I have always admired the access behind shops provided by the New Town's architects – the generous space provided, and the good elevations. Many people, including some of my neighbours, have poor standards of maintenance behind the scenes. The handling of rubbish behind the shops on the east side of the Martlets is not good, and paladin bins might give more capacity for rubbish containment.</p>	Noted.
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Paragraph 3.35	<p>Dustmen are more careful to get all the rubbish into their dustcarts than they used to be, but their vehicles are generally too large, and have to drive over grass and pavements in some parts of the town. I don't know that it happens in Crawley, but around Pulborough there are one-man dustcarts and the vehicle picks the dustbins up without the man handling them. I don't welcome this constant reduction in jobs, as we are seeing in banks and post offices. If it carries on there won't be any supermarkets, post offices or banks</p>	Noted.
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		<p>in town centres. Futurists think that people will stay in their homes and vehicles will come round and manufacture anything they want, using new technology. In contrast to this trend the Referendum resulted in people in the street, and at the bus stop, asking one another what they were going to vote. This sudden socializing was totally unexpected and pleasing.</p> <p>Returning to dustcarts and deliveries by vans, there was a time when bakers' vans, postmen and milkmen were welcome in the street – and small dustcarts. The fast driving and unfamiliar, not very friendly faces that are characteristic of deliveries and collections now are a devastating loss, similar to the local garages and cycle shops going.</p>	
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Paragraph 3.38a	<p>Very good points about the quality of life of residents. The provision of canopies, seating and tables on the pavement, in the summer especially, is very important and should be encouraged by the council. I think it is now, and increasingly popular. Bad musicians and too many touts, especially in the Martlets is a problem. I think buskers on the London Underground are interviewed to see how good they are. Here, the "Big Issue" sellers are usually also beggars, which they are specifically not allowed to be. On the other hand, the market traders make a very good contribution to life on the street, and unlike London street traders leave the street clean when they go home. I wish I could think of some way to stop young people throwing cans, bottles and cardboard food containers onto pavements, and into hedges. I think this anti-social behaviour is a statement responding to the society that doesn't value them, and the diminishing prospects of most of them getting interesting, secure employment when they leave schools and colleges. The</p>	Noted and support welcomed.
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cynical selling off of school sports fields in order to build third rate housing on the cheap is also a bad indication of society's celebration of selfishness and greed.

Due to poor parenting in earlier generations, there is an alarming decline in the present generation of parents; small children are strapped into over complicated, too side pushchairs, and ignored whilst their mothers are glued to mobiles. Not being talked to when you are very young damages your brain, and you used to be as active as possible. Older children are similarly strapped into unduly large vehicles with black windows and driven about. Children need to socialize and explore the world on their own, not be prisoners.

The council's concern about education standards is very welcome, and may improve this situation. Children in this town are being spoiled by neglect, and are bribed to behave by supplying them with bad food, drink and sweets. Many parents are a bad example of parenting to their children, and their children will be in their turn bad parents. Children are not taught to cook, sit properly on chairs at tables, use plates and cutlery or talk to one another and adults. In France, the government is trying to do something about this growing social problem. I don't know how successful they have been, or how they deal with educating people to run their families properly. I do know how nomadic/tribal people and Asian families do it. They treat children like small adults not pets. This is reflected here in the often alarming way people dress children, especially at weekends in the summer.

Paragraph 3.38b

"...assist legibility..." is this jargon? The meaning could be clearer if it was longer. Line 3: add a "d" to "incorporated".

Legibility is a planning/design term that is used to refer to ease of

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			movement from one place to another. Text amended to read 'incorporated'
	Paragraph 4.1	Line 5: the word "offer" occurs again, and must be planning jargon. What does it mean?	The word offer refers to the range of facilities and services, as well as public realm, in the town centre. It is essentially used to identify the key aspects that draw visitors to the town centre.
	Paragraph 4.4	Two or three added commas would assist comprehension, and an added "a" at the end of line 4 would improve it.	Noted. Text amended.
	Figure 2	The lack of pedestrian access in the centre of college road reminds pedestrians that the car is king in the town centre. Almost motorway conditions in town centres should be discouraged. In London, experiments have been taking place removing railing and traffic lights, and cutting speed limits. I don't know how well it is working. Similarly, the Library is cut off from the County Mall by road traffic. There is no merit in this, but I expect that experimental reductions in road traffic calming might initially at least be rather chaotic, and cause problems elsewhere. In Horsham, which I compare unfavourably with Crawley, there are busy roads in the centre with no pavements at all. This is a step in the wrong direction. Very pro motorists in towns.	The council is working with the key partners including West Sussex County Council and other stakeholders to bring forward a number of key regeneration and transport infrastructure projects across Crawley, utilising Coast to Capital Local Enterprise Partnership Local Growth Funds. This includes schemes to improve pedestrian connectivity across some of the main roads in the town centre which is recognised in the SPD. An example is the Crawley Station Gateway scheme. Improving links between different areas of the town is identified as a key general development

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			principle in Section 4 of the SPD, and site specific design guidance for town centre opportunity sites, including Telford Place, Central Sussex College and County Buildings, focusses on reinforcing the public realm and improving pedestrian legibility through careful planning to encourage active frontages and promote sustainable movement across the town centre. Local Growth Fund bids will be prepared to support these improvements.
	Parkside Carpark	<p>I agree entirely that towards the Library the shopping area tails off in the Boulevard and Queensway. Bringing the college the Town Hall and the Library into the centre would improve it.</p> <p>Architecturally, the exterior of County Mall is such a visual insult that your proposal have infill development between the Mall and the Memorial Gardens would be very welcome. I haven't see a plan of County Mall, but I should think shops could be added to the exterior here. The retail area seems to take up only half the space, and certainly at the Martlets end there is under used vehicle "garaging" in the brick façade.</p>	Noted and support welcomed.
	Page 29 Traders Market and	I agree with this, but hope that the right-of-way that was temporarily lost between the former market and Barclay's Bank will remain. At the moment the Peglar Way shops are unsatisfactory, and not a positive destination for pedestrians using the Orchard Street right-	The SPD design guidance advises that removal of the access should be considered as part of development proposals. This is because the access is not a public right of way and is

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	Brittingham House	<p>of-way. The area west of the round-about serving West Green Drive and Ifield Drive is lying fallow, and I don't know what will be built there. Presumably it's waiting for a developer to make a proposal. I agree with what you propose for Orchard Street, and the Barclay's Bank carpark is underused at the moment.</p> <p>The former Woolworth's shop building, which remains unfinished due to the outbreak of World War Two, is severe and neglected, but if properly repaired including restoring and putting back sash windows, it would look quite grand. Could it be completed? Apart from dodgy replacement of some office windows it remains remarkably untouched, so it characteristic of the odd 1930s period of urban architecture when the Georgian period ended (apart from a few Post Office buildings).</p>	<p>subject to vehicular movements and a lack of overlooking which can make it feel remote and unsafe. The preferred design solution would therefore be in-fill development which directs users to the more established access via Orchard Street. However, where it is not possible to remove the access way as part of a new development on the site, the SPD recommends that any development establish an active frontage onto the access way so as to improve surveillance and create a more attractive alleyway</p> <p>The area to the west of the Ifield Drive/West Green roundabout is known as the former Southern Counties site. This has outline planning permission and approval of reserved matters for the development of 218 flats and supporting facilities.</p>
	Key planning and design principles a)	<p>"Materials that contrast with those of the existing building will be encouraged". This seems promising, if architects take a leaf out of Sir Edwin Lutyens book. He understood, loved and exploited building materials, and used a lot of everything in most of his buildings. They were always a celebration (and expensive and long lasting). He would have despised cheapjack firms like Marley and Marshall's, who misuse concrete in order to make bricks and</p>	Noted.

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		<p>paviours that undercut good manufacturers working in baked clay and stone. As you know the Romans used concrete and it a good material when used honestly, as in my house.</p> <p>Hopefully, this free use of materials will not result in buildings in badly executed post-modern style, like the "fairground" buildings added to Crawley College of Technology (now Centre Sussex College) at the junction of College Road and Haslett Avenue East.</p> <p>Bearing in mind the considerable size of the quarrying industry in West Sussex, and the beautiful sandstone buildings in earlier centuries, I don't know why local materials – apart from Horsham slates – are seldom if ever used in Crawley buildings now.</p>	
	Page 30 Key planning and design principles b):	The removal of superfluous signs, posts etc. to reduce clutter. In the days of the Civic Trust, it was possible to attached street lights to buildings. I don't know how this was arranged with landlords, but in the past it was commonplace. Unfortunately, we are in a period when bogus art deco-like street lighting is available, and bogus Victorian land standards. These are the worst lampposts ever made, and it a shame when beautiful modern ones could be used. I never see them in this country because authorities always buy the cheapest lighting available from Philips. Ghastly. This includes West Sussex CC.	Noted.
Central Sussex College (East of Tower)		The traffic calming and the gateway development are both very positive, as long as good architects are used. Could this be done through organising an architectural competition? I cannot emphasise too strongly that the arts are in a crisis that began fifty years ago, and becomes worse day-by-day/ the word "creativity" should never be used. It means stupid, pointless nonsense, and	Noted and support welcomed. The land is not in public ownership and the Council, cannot, therefore dictate the architect.

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		usually has the blessing of the Royal College of Art, Goldsmith's College and the Saatchi Art Gallery. You already have some examples including bad blacksmithing near Barclay's Bank. Even good artists and designers sometimes let you down. It is safer to buy something existing. Commissioning artists, craftsmen and designers was one of my jobs, and it is very risky. More so than commissioning architects because <u>they</u> work with engineers, who ensure a little sanity in the design process.	
	Page 31	Line 5: delete "s" from "Banks".	Noted. Text amended.
	Page 36 Option 2	In Brunel Place, the former Avery office and workshop building is looking neglected. Like the buildings on the County Buildings on page 33 it is a good example of a New Town dual purpose building, and surprisingly in its small scale, nicely integrated.	Noted.
	Page 46. Town Centre and edge-of- centre sites	This section is very welcome and all being well Crawley will avoid the fate of towns and villages that often decline from the centre. I don't know the industrial sites quite as well as the Primary Shopping Area – I know Talis at Manor Royal best – but the standard of architecture on them has for many years been better than in the town centre. As I think I have said above, if the public was better informed about the products and services available on the industrial sites they would think better of the town and as a shopping area. The death of much industry here in the Thatcher period, caused a loss of Crawley Tools-like marvellous shops, but I think there has been a recovery now that companies like Caterham have come. How to publicise these more specialized warehouse type firms?	Noted and support welcomed.

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	6. Skills development	<p>I was very pleased to find this section in your report, and I didn't know that a local council would try to make this deficit good – especially when all recent governments have failed miserably. The latest ideas, about Academy Schools, are about to fail due to the coming government cuts to their budgets. The discussions about a Chinese powerstation are part of this ongoing decline.</p> <p>Crawley College has always had a good reputation for its aero engineering and its bricklaying courses, but I know a lot about British and world education, and I despair. The closing of the GLC was a disaster for British education, urban planning and architecture. As an authority, it was excellent, and world famous, but with a few exceptions like Millfield School British education is very bad. I think it is rated about 30<sup>th</sup> in the world and to make the situation worse nobody admits it.</p> <p>Although I have a good knowledge of all aspects of education I have by choice only worked in further and higher education. When I was teaching in universities we often found that student's parents, and state education had failed them – public school education had also failed the small minority I taught who wished to be designers. Knowing this, some of the projects we set incorporated elements intended to remedy some of the deficits. It was often evident that overseas students were better educated, and they usually did well after graduation whether they decided to stay here or returned to their home countries.</p> <p>Poor training is as much to blame on companies as parents and schools. The reason for this is probably due to the fact that not many companies or organisations in Britain are well managed. Last week, I phoned the Forestry Commission in Lyndhurst in the New</p>	<p>Noted and support welcomed. Skills development is a key corporate objective for the council, which is being prioritised through the Crawley Employment and Skills Plan and through joint working initiatives such as the Town Centre Skills Academy.</p>
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Forest. After numerous attempts to find someone to talk to a land agent answered. He said "I don't know how you found my phone number, and as it is a Friday afternoon; knowing that we are all Civil Servants you wouldn't expect anyone to be here". As I pay their wages, and I was always working when I had a job I did expect them to be there, but I thought they would have gone home early, knowing how lazy Civil Servants are. This is the famous British Disease, laziness and bad management.

Yesterday, I had two more examples – or three. In The Works bookshop in County Mall, I asked about a book they had on the shelves a few days ago, and was told "If it aint on the shelves we aint got it". Asked if I could have the phone number for the Horsham branch I was told "We aint got it, but you would probably find it online". The do have it on their side of the counter, but can't be bothered with customers.

In Gregs cake shop, only one of the numerous assistants knows how to wrap bread puddings up in foil, and put them into a paper bag. I have told several of the others how to do it, but they don't take any notice.

The staff in Sainsbury's used to know how to pack a shopping bag, and they did it for each customer. Now, they sit and watch the customers doing it badly and don't offer any advice.

Shopkeepers from other countries have their children in the shops with them, and they learn the trade, including how to speak to customers, smile and remember their names. Thank goodness they have come.

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	Page 62: General Questions	<p>Question 11: are there any ways in which the SPD could be made easier to use and navigate?</p> <ul style="list-style-type: none"> <li>• Add an index to all the parts of the report – probably in the last one.</li> <li>• Use small headings and set the synopsis in smaller bold type ranged left not justified.</li> <li>• Over printing annotations in small black type over the full colour figures makes them difficult to read; headers in the margins would read better.</li> <li>• Reduce the number of acronyms to make reading easier.</li> <li>• Style-wise, use the rule for capitalization of words/names “if in doubt use lower case”.</li> </ul>	<p>Noted. The addition of an index is a time-consuming exercise and the advantages therefore need to be weighed against other possible improvements to the guidance. In general the approach is to try to provide adequate signposting by means of contents, visual aids, and clear formatting. Acronyms are used to keep the document shorter and more readable. Where acronyms are present, these will have been written in their full form at the outset for clarity. Diagrams have been revisited.</p> <p>The SPD is required to comply with the council's corporate document layout.</p>
		<p>If there are any old commercial buildings left which might be used if a change of the goods offered could be permitted – or if it applied to good Old Town buildings as is happening to the offices in the Boulevard – changes can be almost invisible if very good architects are used.</p> <p>An example I have in mind is the Wolseley at 160 Piccadilly. It began in the 1920 as a motor showroom for Wolseley cars, and was changed in the 30s as a Barclay's Bank. Then in about 2000 it changed to a restaurant. Externally it remains the same, but surprisingly most of the interior has been retained and added to. Crawley doesn't have anything quite that opulent but it can be done</p>	<p>Noted and support welcomed.</p>

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		<p>with some help from English Heritage. Fortunately the former Middlesex County Hall in Parliament Square was eventually rescued and turned into the Supreme Court. The amazing Edwardian interior was nearly lost when Westminster Council agreed to its conversion. The pressure group SAVE managed to prevent the loss of the interior.</p> <p>How I wish a report like yours had come out fifty years ago – so many lovely buildings have been lost, mainly in the Old Town, but I never expected to see such thorough, forward thinking work being done in this country. Everyone involved has done a marvellous job. I don't expect all your ambitions will be rewarded by being implemented but you are no longer alone. As you probably know, similar efforts are being made all over the world to put a stop to wholesale loss of good buildings to satisfy developers and supermarkets' greed.</p>	
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Crawley Town Centre Partnership		<p><b>Question 1: Supporting Sustainable Economic Growth in the Town Centre: Are there other ways in which economic development can contribute positively to the economic character of Crawley Town Centre?</b></p> <p>We would suggest that more consideration should be given to uses that create a vibrant town centre during a wider range of hours, including those that create a sense of atmosphere, eg. through outdoor activities. Overall the policy aims are supported and the flexibility in allowing 'other forms of economic development' through the submission of an economic statement is welcomed.</p>	<p>Noted. The Local Plan and expanded guidance set out in the SPD seek to be flexible so as to encourage a range of different uses and activities within the town centre to enhance its offer as an engaging and vibrant place. The SPD recognises the role of both the day-time and evening economy, and also outdoor activities such as seating areas, in creating a sense of atmosphere and takes a positive approach in planning for these. As noted in the representation,</p>
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			a flexible policy approach will enable other appropriate town centre uses to come forward where these add to the overall vitality of the town centre.
		<p><b>Question 2: Controlling the Loss of Employment Floorspace in the Town Centre Does the Town Centre SPD strike an appropriate balance between planning for Main Town Centre uses such as commercial, leisure and retail and supporting the delivery of residential development?</b></p> <p>In summary “yes”, however, it is a difficult balance to strike, it needs to be a balance which is adjusted regularly and should be something which is reviewed earlier than 2030. Policy flexibility is key and it is considered that this is achieved with the balance strongly favouring residential on upper floors within allocated residential areas, and employment use on other sites. Allowing increased residential development is welcomed as this will bring more people into the town centre, thus increasing the vitality and viability.</p>	Noted. Policy EC5 supports the efficient use of upper floors, including for residential, to help maximise the use of space promote vibrancy be introducing a residential population to the town centre. It is appreciated that a balance needs to be struck however, and the SPD also provides guidance to assist developers to avoid conflict with existing commercial operations. If necessary, the flexible approach to promoting residential on upper floors will be revisited should an early partial review of the Local Plan be required.
		<p><b>Question 3: Ground Floor Changes of Use in the Primary Shopping Area</b></p> <p><b>a.) Does the Town Centre SPD provide enough guidance to explain when an economic statement is required and the type of information that is needed?</b></p> <p>Yes, however, some guidance is needed regarding ground floor mixed use. Is it the whole ground floor that is important, or just the frontage? The type of information required is clearly set out, and so</p>	a.) Noted. The SPD encourages the efficient use of upper floors, though recognises that this may require adjustments to existing ground floor units to facilitate access. Paragraphs 3.36-3.38 of the SPD seek to strike a balance between facilitating this access and the need to maintain the

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		<p>is the additional information regarding how to show that the proposal contributes to town centre aspirations.</p> <p><b>b.) Are there any other ways in which proposals can show how they would support the vitality and viability of the town centre which can be referred to in the guidance?</b></p> <p>It is also possible to consider if something may add to the cultural dynamic of the town. A scheme may also assist indirectly with vitality/viability if it contributes monetarily towards the management and maintenance of the area.</p>	<p>integrity of the ground floor unit as a commercial premises, and ensure that the vitality of the town centre street scene is not undermined. The guidance seeks to remain flexible to enable each case to be judged on its individual merits, though additional text has been added to assist clarity.</p> <p>b.) Noted. Additional wording has been added to paragraph 3.13 and accompanying guidance box to refer to the introduction of new operations and improving the range of choice.</p>
		<p><b>Question 4: Upper Floor Change of Use in the Primary Shopping Area to Main Town Centre Uses or Community Uses Does the policy set out appropriate criteria to ensure that upper floor development for main town centre uses contribute positively to the town centre?</b></p> <p>Yes. Proposals are encouraged where they utilise under-utilised space in a more beneficial way. Slightly vague as to what 'regard' will be given to each aspect listed. However, the basic idea behind the policy is clear, in that any proposal which makes better use of upper floor space will be supported, and also any townscape improvements will be welcomed.</p>	<p>Noted. Again, this policy supports the efficient use of upper floors, and the intention is to allow flexibility to enable a range of uses. It is however recognised that some uses may not be appropriate, for example where there is an existing amenity-sensitive use in close proximity, and guidance therefore seeks to flag some of the key considerations that will need to be weighed up in reaching a decision.</p>
		<p><b>Question 5: Upper Floor Change of Use in the Primary Shopping Area to Residential Uses</b></p>	<p>a.) Noted. The SPD should be read in conjunction with the Local Plan,</p>

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		<p><b>a.) Does the policy set out appropriate criteria to ensure that upper floor residential development contributes positively to the town centre?</b>                      The policy is drafted, understandably, in a way which aims to stop the upper floor uses from contributing negatively rather than to ensure they contribute positively. More onus could be placed on improving the townscape, and also more focus on high quality development.</p> <p><b>b.) Are there other measures that can help to manage the relationship between commercial and residential uses in the Town Centre?</b>                      Possible requirements to improve the townscape on the street below the development/provide financial contributions towards this, but not so much as to effect the economic viability of the development. With increased residential use in the town centre there is likely to be more demand for bars/restaurants and other uses continuing into the evening. This should be welcomed, but will need careful management through the planning process to ensure residential amenity is adequately protected.</p>	<p>which contains policies relating to achieving good design and high quality development. It is however appreciated that further clarity would be beneficial, and additional paragraphs have been added to provide additional guidance on achieving appropriate internal space standards and good design.</p> <p>b.) Noted. Developer contributions will be sought where required and monies may be directed to townscape improvements where appropriate. The SPD provides guidance on the amenity relationship between commercial and residential uses, and includes a section on street furniture.</p>
		<p><b>Question 6: General Development Principles for Town Centre sites: Do you have any comments on the general development principles for town centre sites?</b>                      All laudable but very broad and undefined aims, 'support and diversify Crawley's role as a sub-regional centre'. What are Crawley's current strengths as a sub-regional centre? Into which areas would diversification be welcomed? Facilities to be provided to new and existing residents could also be further explained, in terms of the kind of facilities intended.</p>	<p>Crawley is one of the leading town centres in the region with a strong retail and leisure offer that attracts visitors from a wide catchment area. The text is intended to be flexible so as to encourage a variety of growth and investment to the town centre, so does not seek to prescribe particular uses.</p>

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**Question 7: Development Guidance and Principles for Sites within the Town Centre Boundary: Do you have any feedback on the suggested development guidance and principles for these sites?**

The guidance is very prescriptive in parts, and it is suggested that there should be greater flexibility. Prescription reduces flexibility/innovation and makes the town less attractive to developers. However, if a constraint is identified with a site, which needs to be dealt with in order to develop the site, information on this is helpful. Overall it is acknowledged that paragraph 4.9 and 4.10 state that the detailed guidance is not intended to be prescriptive but we feel there is a real danger that the LPA may view the guidance in that way.

The SPD is clear that guidance is not intended to be prescriptive. Rather it seeks to assist developers by showing how development proposals could satisfy design requirements set out in the Local Plan. It may be that applicants wish to explore alternative approaches through the design process, and the council is keen to work with developers to identify workable solutions that promote good quality design and bring forward these town centre sites for well-planned sustainable development.

**Question 8: Retail and Leisure Development outside the Primary Shopping Area**

**a.) Does the Town Centre SPD provide sufficient clarity as to how town centre, edge-of-centre and out-of-centre locations are defined?** Yes. More clarity on the fact that out of centre includes all other areas would be helpful (showing this on Figure 3 would be useful).

**b.) Are there other factors that should be considered in the application of the sequential test?** No.

**c.) Are there other factors that should be considered in the application of the impact test?** No.

a.) Paragraphs 5.7 to 5.15 provide a detailed overview of Crawley's retail hierarchy, which is summarised in Figure 4. Figure 3 shows how town centre and edge-of-centre sites are identified, and when read in conjunction with the supporting text, it is felt to be clear where a site would be considered to represent an out-of-centre location.

b. and c,) Noted.

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		<p><b>Question 9: Town Centre Skills Academy: Does the SPD provide sufficient guidance on how developers can participate in the Town Centre Skills Academy?</b></p> <p>Yes the guidance is clear, however, the willingness of developers to participate may be limited. The LPA could seek to use its powers to secure local employment and skills obligations. The benefit for developers could be more clearly set out.</p>	<p>The Town Centre Skills Academy is not a new concept and has been introduced at a variety councils with the guidance of CITB (an organisation which construction companies pay a levy too in order to represent them and help them with their needs). It has been proven a success and developers have been more than happy to participate in the scheme and see the benefits. Many developers already meet the requirements needed for skills academy status, and the concept reinforces and publicises their good work, going beyond the council's current Crawley Developer and Partner Charter (again, which many developers have happily agreed to). The benefits for the Town Centre Skills Academy are vast and developers acknowledge this. They include helping to decrease identified skills shortages and increasing community profile. Amended wording has been added to the SPD to make clearer the benefits to developers and residents.</p>

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		<p><b>Question 10: Engagement: Have we identified the key stakeholder groups that have an interest in the future planning of the town centre? Are there any stakeholders missing?</b> All key stakeholders are identified.</p>	Noted.
Aurora Property	Crawley Station and Car Parks (Station Gateway)	<p>Thank you for consulting with Arora in respect of the proposed Town Centre SPD. The general approach of the document is appropriate but having regard to its purpose to help bring identified local plan development sites forward it is considered to be overly prescriptive in respect of the Station Gateway site which already has planning permission and is therefore at a more advanced stage.</p> <p>Our site has involved well over 2 years of detailed work / public consultations etc and although the permission is an outline with all matters reserved it was prepared as full application save landscaping and was only switched to a full outline due to timescale pressures relating to complex highway design requirements coupled the urgent need to obtain consent prior to introduction of the new Crawley CIL regime (the scheme's viability is marginal at best).</p> <p>The Council's current urban design officer is the 3<sup>rd</sup> to provide design advice on this scheme but it is widely at odds with that provided previously and is considered overly prescriptive and detailed:</p> <p>Page 36 a.) 2<sup>nd</sup> bullet: we do not consider it appropriate to encourage ground floor non-retail active frontages along the Station Way edge of the site. Such uses are likely to compete with the Primary Shopping Area to its detriment. Only commercial uses</p>	<p>(p36, a. 2<sup>nd</sup> bullet): The guidance seeks to encourage non-residential uses along the Station Way site frontage. This does not have to be</p>

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		<p>ancillary to the needs of railway users are proposed in the scheme with the remainder of the ground floor required for much needed residential access and car parking which is already at a very low ratio.</p> <p>Page 36 a.) 3<sup>rd</sup> bullet: states: <i>Integrate with neighbours to the south of the rail line so that the railway site will have two frontages.</i> I am not too sure what this means in practice - the southern frontage to the main development is the railway tracks so it cannot physically integrate with neighbours to the south. The proposed southern elevation is a fully active (non secondary) elevation in terms of main habitable windows so perhaps this bullet point should be deleted?</p> <p>Page 37 a.) 4<sup>th</sup> bullet states: <i>Ensure that the Brighton Road edge of the site is designed into the scheme and activated (while respecting the Brighton Road Conservation Area) as a secondary gateway to the town centre.</i> The scheme's Brighton Road frontage is only about 6.5m long, set back about 3m from the High Street pavement and separated from it by a car park in private ownership. We will be using this part of our site for a small garden area with a secure boundary fence/wall. It is not considered that this proposed small garden area justifies a bullet point in the SPD.</p> <p>Page 37 c.) 2<sup>nd</sup> 3<sup>rd</sup> &amp; 4<sup>th</sup> bullets refer to improvements off-site on land under the control of the owner of the County Mall Shopping Centre and Bus Station. Our original proposals sought to include public realm improvements to the bus station and County Mall but these were effectively dropped due to County Mall's owner pursuing their own development proposals involving building above</p>	<p>retail and could be other non-residential uses that promote activity. Any commercial development would be of a relatively small-scale that is ancillary to the railway station, and is intended to primarily serve railway customers and to improve the amenity of the area around the station so as to better integrate it into the Town Centre. Bullet point text has been amended to emphasise this point.</p> <p>(p36, a. 3<sup>rd</sup> bullet): Local Plan Policy CH4 calls for the efficient use of land and that development does not unduly restrict the development potential of adjoining land. The south side of the rail line features large developable sites (some that are unoccupied) and that are earmarked as key housing sites in the Local Plan. The objective of this principle is to encourage a comprehensive approach to the station site, helping it to integrate with its surroundings including adjacent sites. Text amended accordingly.</p>

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		the bus station and are not therefore part of the Station Gateway scheme.	<p>(p37, a. 4<sup>th</sup> bullet): Local Plan Policy CH4 provides for a comprehensive approach to development. The principle here recommends that the Brighton Road frontage be addressed as a secondary gateway to the Town Centre and link the development with Brighton Road, an important and thriving retail strip. The principle also acknowledges that development at Crawley Station will predominantly be focussed towards the axis of Friary Way. Station Way, west of Friary Way, is an important route and the public realm along here should provide for an improved pedestrian experience. An attractive/interesting endpoint or termination to this edge will assist in this role.</p> <p>(p37, c. 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> bullet points): The guidance relates to Station Gateway and its surrounds. It is appreciated that the area is not in a single ownership, but wider areas including County Mall, Station Way and Friary Way form part of the context of the Station Gateway site and represent opportunities to deliver wider regeneration improvements. The</p>

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			guidance seeks to flag this opportunities should other landowners wish to pursue these options in the future.
RDJW Architects		<p>Thanks for including us in this SPD for the town centre and in particular for Cross Keys.</p> <p>I have read through the relevant portion of the document and would comment as follows:</p> <ol style="list-style-type: none"> <li>1. The definition of an intimate, informal public space between the development site and the existing Church Hall should be clearer. I am unsure of how you would envisage this space being used.</li> <li>2. I would disagree with the height restrictions, scale and massing. Whilst I appreciate the proximity of the Church, the main views of this building are from Haslett Avenue and the High Street.</li> <li>3. It would clearly be a commercial decision as to who occupies the ground floor units and any restriction on the sizes may result in difficulties with lettings.</li> </ol>	<p>1. In the townscape context of the text Church Walk is a narrow semi-linear alleyway, reminiscent of Sussex's historic twittens. It is this character that the SPD is seeking to retain and replicate. Clarification on uses added to the text (third and fourth bullet points of Key Planning and Design Principles – Cross Keys).</p> <p>2. Noted. Height restrictions have been amended. Views of the church should be respected and this is established as a key site principle through the SPD. Text amended (sixth bullet of Cross Keys specific guidance) accordingly.</p> <p>3. Noted. The text indicates the need to establish the appearance of small shop fronts. This would not preclude larger occupants so long as they maintain the appearance of small shop fronts.</p>

**Crawley Borough Council – Crawley Town Centre Draft SPD – Site specific Comments From Thames Water, July 2016**

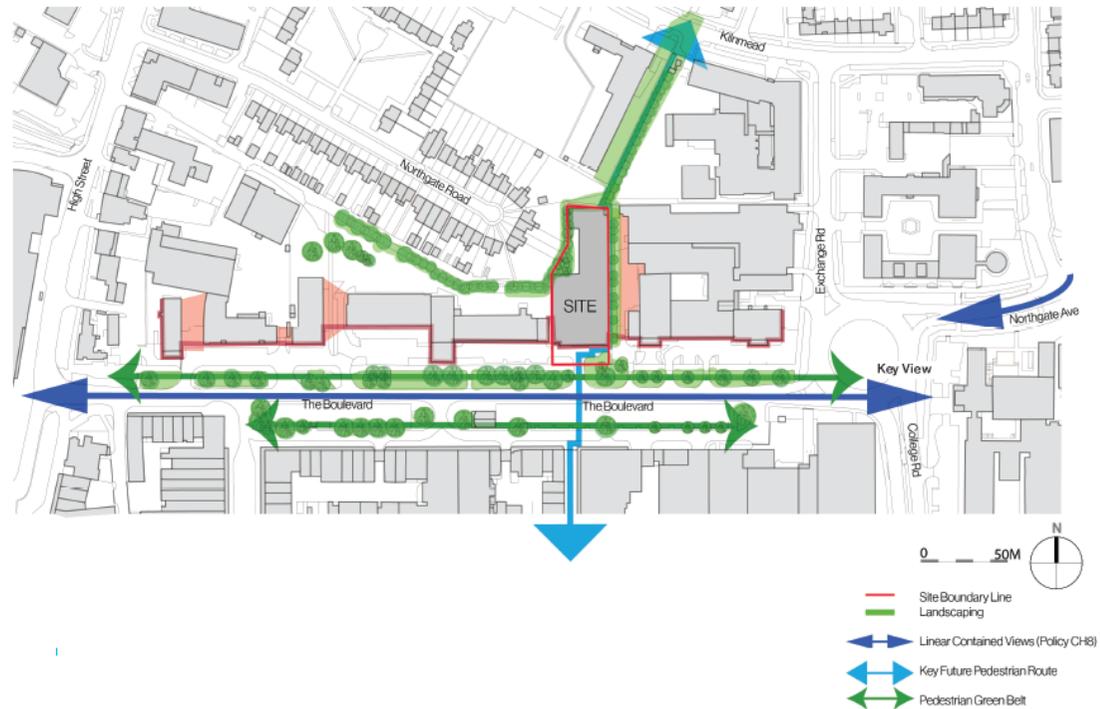
<b>Site ID</b>	<b>Site Name</b>	<b>Waste Water Comments</b>
20704	5 - 7 Brighton Road Southgate	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
51999	County Buildings	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
42712	Crawley Station and Car Parks	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
6209	Fairfield House, West Green	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
10854	Land North of the Boulevard	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

Site ID	Site Name	Waste Water Comments
52022	Southern Counties, 27-45 Ifield Road, Crawley	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
14415	Telford Place	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
51467	Zurich House	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

## 2.5 KEY VIEWS, CIRCULATION & BUILDING LINE

Crawley planning department has identified the Boulevard as a main axis for views and street scape.

The line of the surrounding existing buildings steps in and out along the street. There is no consistent building line along the north side of the Boulevard. Building heights are also very varied ranging from 4 to 10 storeys. The pink areas indicate voids which add to the discontinuity of the street line.



\*\*\* Plan attached to Westrock Representation

12/25