

WORTH CONSERVATION AREA STATEMENT: CONSULTATION REPRESENTATIONS RECEIVED AND COUNCIL RESPONSES

STATEMENT OF COMMUNITY INVOLVEMENT: WORTH CONSERVATION AREA STATEMENT			
Respondent	Para/ Page no.	Comments	Council's Response
ASP on behalf of Melanie Verity, Vanessa Elliott and Michael Robinson		<p>The area of land under our clients' control is shown on the plan attached at Appendix One and is associated with the property 'Oaksworth', Worth Way, Crawley. Our clients' land includes the eastern pond and adjacent land referred to in The Statement. The entire area of the clients' land lies within the Conservation Area.</p> <p>We firstly note the proposed status of The Statement as a material consideration when the Council determines planning proposals for the area, and that the aim is to ensure it should be used to manage change in a positive manner and help inform future action by the Council and other parties. This would include informing decisions on planning applications that may have an impact within or adjoining the Conservation Area, and assisting in the design of proposals affecting existing buildings or new development.</p>	Noted. The Conservation Area Statement seeks to ensure that where development is proposed, it comes forward in a manner that preserves or enhances the character and intrinsic features of the Conservation Area.
ASP on behalf of Melanie Verity, Vanessa Elliott and Michael Robinson		<p>The Statement is considered to appropriately assess the existing character and historical development of the Conservation Area, the principle buildings within it and its relationship to the wider area including the urban area of Crawley and the countryside beyond the M23 corridor. The wider parkland setting of St Nicholas' church and other designated and non-designated heritage assets and the loose-knit arrangement of existing dwellings it is agreed, make a significant contribution to the overall character of the area. The Statement is also clear in its overall aim that through appropriate management and intervention measures the predominantly existing rural character of the Conservation</p>	Noted and support welcomed.

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		Area, despite its location adjacent to the wider urban area of Crawley, will be preserved or enhanced.	
ASP on behalf of Melanie Verity, Vanessa Elliott and Michael Robinson		We welcome the fact that The Statement does not preclude development within the Conservation Area, instead setting the context and providing parameters against which any development would be judged.	The Conservation Area Statement identifies the special architectural and historic values of the area and features that contribute to its character and appearance. Where development is proposed, the statement provides guidance to help ensure that this comes forward in a manner that preserves or enhances the character and intrinsic features of the Conservation Area. The Conservation Area Statement is not a standalone document, and should be read alongside and within the context of the NPPF and the Crawley Borough Local Plan 2015-2030.
ASP on behalf of Melanie Verity, Vanessa Elliott and Michael Robinson		We also note that the document suggests when opportunities arise, that improved management through removal of invasive species and improvements to the areas around the existing ponds should be undertaken. This is of particular import to our clients as it directly affects land under their control as does potentially the stated desire in the document to explore the potential to link informal pedestrian routes into Worth Way. We consider that our clients' land could potentially assist in the process of securing improved access through the Conservation Area to the Church and also directly to Worth Way, as well as providing the opportunity to manage the existing woodland and pond to retain	The Conservation Area Management Plan (page 37 of the consultation document) identifies opportunities to enhance the biodiversity of the SNCI, including management of grassland and woodland, and also restoration or enhancement of the fish ponds. The council would welcome opportunities to work with landowners to help bring about improvements that enhance the natural and biodiversity value of the Conservation Area.

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		the eastern setting of St Nicholas church and the rural nature of the Conservation Area whilst enhancing biodiversity.	
ASP on behalf of Melanie Verity, Vanessa Elliott and Michael Robinson		<p>Coupled with this, opportunity is also considered to exist, subject to appropriate design and detailing to provide the type of low-key and loose-knit residential development allowed for in The Statement on suitable areas within the clients' landholding.</p> <p>Ourselves and the landowners are keen to work with the Council to secure an appropriate overall package for the site that would allow limited development but which would also secure enhanced public access and biodiversity and woodland management improvements. In due course, we will be making a formal approach to the Council in this regard. Further commentary is provided on this in the separate response to the Development Brief. In this regard, I would advise that initial acoustic assessment work has been undertaken on the clients' land in relation to existing noise levels, the results of which, clearly indicate that there is no in-principle impediment to residential development on the land arising from the nearby M23. It is considered that through the detailed design and siting of any new development, not only can any impact on future residents of new dwellings be satisfactorily addressed, but it is likely that current noise issues in the wider Conservation Area, in particular within the grounds of St Nicholas' Church, can also be assisted through the design and layout of any proposed scheme, thus achieving a welcome enhancement in the character of the Conservation Area.</p>	<p>Worth Conservation Area was designated in March 1987 in order to preserve and enhance the character of the setting of St. Nicholas' Church. The Conservation Area is situated outside of the Built Up Area Boundary and represents a countryside location in policy terms. This is reflected in the Conservation Area Statement which seeks, as a key objective, to retain the countryside setting of St. Nicholas' Church. The scope for development within the Conservation Area, outside of the identified Local Plan allocation, is therefore limited.</p> <p>Should new buildings be proposed within the Conservation Area, proposals will be carefully considered against the overarching objective to retain the countryside setting of St. Nicholas' Church.</p> <p>The Conservation Area Statement is not a standalone document, and should be read in conjunction with the NPPF and Crawley Borough Local Plan 2015. Local Plan Policy CH9, which relates to development outside of Crawley's Built-Up Area Boundary and provides specific guidance relating to the Tilgate/Worth Forest and Fringes Character Area, will be of particular relevance,</p>

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			<p>together with Policy ENV11 (Development and Noise).</p> <p>Given the sensitive setting of the Conservation Area, where new buildings are proposed applicants are strongly urged to enter into pre-application discussions at an early stage.</p>
Environment Agency	Pages 29-31	Pages 29, 30 and 31 set out the Guidance for Development and the Key Local Plan Policies. As there is an area of floodplain associated with the Gatwick Stream on the southern boundary of the site, we would enquire whether it would be prudent to include ENV8 Development and Flood Risk so this is highlighted at an early stage.	Noted. Additional text added in relation to Local Plan ENV8 (Development and Flood Risk). Flood risk within the Conservation Area is considered in further detail through the Land East of Street Hill/Balcombe Road Development Brief.
Historic England		We have reviewed the draft and we do not wish to offer any specific comments on this occasion. However we do note that this will be a useful update of the 2003 Conservation Area Statement, particularly as it includes a more detailed analysis of the character of the conservation area and the importance of setting within it.	Noted and support welcomed, particularly with regards to the more detailed analysis of the Conservation Area character and the importance of setting within it. We note that the Historic England representation submitted in response to the draft Land East of Street Hill/Balcombe Road Development Brief also supports discussion of key views in the Conservation Area.
LPD on behalf of Mr & Mrs Trivass		There is a typographical error on page 5 where the property is mistakenly referred to as Beaufort Cottage – please amend.	Text amended accordingly.

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<p>LPD on behalf of Mr & Mrs Trivass</p>		<p>1. It is our contention that the property does not contribute to the character of the Conservation Area and therefore should be excluded from it as is the open land to the east of the property north of Worth Way. The boundary of the Conservation Area should run down the footpath on the western side of the property and continue eastwards along Worth Way.</p> <p>2. The property does not provide views or vistas to the rest of the Conservation Area. It is at the extreme end of the Conservation Area and mostly not visible from Worth Way which being a sunken lane is at a considerably lower level and screened by high hedging. Your View No 2 (Figure 21. Valued views to/from/within Worth Conservation Area - page 23) demonstrates this effectively and in the description rightly points out that "loose-knit dwellings on large plots run to the south of Worth Way" – not the north.</p> <p>Therefore we would request the boundary is amended accordingly and Beaumont Cottage taken out of the Conservation Area.</p>	<p>Disagree. The Worth Conservation Area Statement (July 2017) updates the previous version of the document (August 2003) and does not propose to amend the established Conservation Area boundary.</p> <p>Worth Conservation Area was designated in March 1987. The original Worth Conservation Area Statement (June 1990) describes and shows the Conservation Area boundary as running <i>'along the northern boundaries of Fieldgate and Beaumont Cottage, down the motorway, across to Balcombe Road, just south of the moat and northwards up Balcombe Road, Street Hill'</i>. Section 3.15 of the 1990 Statement identifies Beaumont Cottage as one of <i>'several unlisted buildings within the Conservation Area which, although not of significant historical or architectural interest, add to the area's character'</i>. This wording is, appropriately, retained in the current Conservation Area Statement.</p> <p>Worth Conservation Area is designated in order to preserve and enhance the setting of St. Nicholas Church, and its boundary responds to this objective through delineating and defining the rural church setting. This position is endorsed by Historic England, which through representations made to the Local Plan examination states that</p>

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			<p><i>'despite the growth of Crawley and the construction of the M23 in recent decades, the largely rural situation of Worth Church and open character of the conservation area has remained. The boundaries of the conservation area were drawn specifically to protect this isolated rural character'</i></p> <p>The low-density built form of the Conservation Area is characterised by its relationship with the landscape, taking the form of large houses of generally two storeys which are located on large irregular plots. The rural loose-knit, low-density form and character of detached dwellings within the Conservation Area is clearly distinct from suburban high-density modern residential development that is located outside of the Conservation Area.</p> <p>Although Beaumont Cottage is not viewable from all sections of Worth Way, the property can clearly be viewed from Worth Way. The land and property at Beaumont Cottage, with its large detached building footprint and generous irregular plot size, relates to and is consistent with the established low-density, loose-knit rural character of residential properties of the Conservation Area. It is therefore entirely appropriate that the property and land at Beaumont Cottage continues to form part of the established Conservation Area. The</p>

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			<p>suggested amendment to the Conservation Area boundary, which seeks to exclude the land at Beaumont Cottage from the Conservation Area, is therefore not accepted.</p> <p>For clarity, text relating to View No. 2 (Figure 21) has been amended to make clear that the form of the residential properties to north and south of Worth Way are consistent in terms of density, scale and building plot. This now reads: <i>Loose-knit detached dwellings on large, irregular plots run to the south lie either side of Worth Way.</i></p>
<p>LPD on behalf of Simon Christopher Wetz and Josephine Williams</p>		<p>I act for Simon Christopher Wetz and Josephine Williams who own land to the north of Worth Way under title No WSX274595 which lies within the Worth Conservation Area (copy plan attached). We would wish to make the following comments / observations on the Worth Conservation Area Statement which has been published for consultation. Our comments are as follows:-</p> <p>We support the statement that “Conservation Areas require careful management to protect their special character. This is not to say that all development and change is prohibited, but that where development is proposed, it should come forward in a manner that preserves or enhances the intrinsic features of the Conservation Area”.</p> <p>This is borne out by the specific allocation of land in the Crawley Borough Local Plan 2015-2030 within the Conservation Area and</p>	<p>Noted. Figure 15 shows the Conservation Area Boundary in addition to key landscape features and designations that are relevant to the historic and architectural interest of the Conservation Area. As such it would not be appropriate for this figure to refer to developments, either permitted or allocated, which do not relate to the historic or architectural reasons for the Conservation Area designation.</p> <p>Figure 23 sets out Local Plan designations that are relevant to Worth Conservation Area. Land East of Balcombe Road/Street Hill is an allocated Housing, Biodiversity and Heritage Site identified under Local Plan Policy H2. As a formal Local Plan allocation for the Plan Period 2015-2030, it is</p>

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		<p>the preparation of the Land East of Balcombe Road/Street Hill, Worth Development Brief. In the section Development Guidance specific reference is made to Planning Permission CR/2015/0637/FUL which “was granted in February 2016 for one large, double storey, detached dwelling on a generous and irregular plot and presenting a design and appearance that is in-keeping with the Conservation Area. This permission provides an example of development consistent with the principles set out in this brief.”</p> <p>For consistency we consider that this permission should be shown on the plan Figure 15. Worth Conservation Area, Key landscape features and designations and Figure 23. Land East of Balcombe Road/Street Hill along with the text contained in the Development Brief above.</p>	<p>appropriate to show this site on the map alongside other relevant designations.</p> <p>The respondent's land benefits from Planning Permission CR/2015/0637/FUL. Whilst the Conservation Area Statement cannot and would not over-ride this permission, the permission is time limited and must be implemented or renewed within a set time frame. Given that the permission could lapse or indeed be implemented, and may therefore become outdated, it is not considered appropriate to show the development on a figure that is intended to show Local Plan policy designations.</p>
<p>LPD on behalf of Simon Christopher Wetz and Josephine Williams</p>		<p>In the section on New Buildings the Consultation Draft states “Where proposals for development do come forward, it is vital that new buildings are of high quality design that respects the character of the Conservation Area, as well as the design, scale and groupings of the existing built form, particularly when visible from important viewpoints.”</p> <p>I would refer you to the officers report to committee in relation to application CR2015/0637/FUL para 5.2 Principle of Development –“ The site is located within the Worth Conservation Area and outside the built up boundary as defined by the Local Plan Map. Policy CH13 of the Local Plan states all development within a Conservation Area should individually or cumulatively result in the preservation or enhancement of the character and appearance of</p>	<p>Noted and text amended.</p> <p>It is recognised that the respondents' land, known as Land off Worth Way (South of Saxon Road), has planning permission CR/2015/0637/FUL for development of a detached two-storey dwelling with attached garage.</p> <p>The Draft Land East of Balcombe Road/Street Hill Development Brief includes a footnote that refers specifically to permission CR/2015/0637/FUL, identifying it as a good example of sympathetic development that is consistent with the character and setting of the Conservation Area. For</p>

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		<p>the area; and PolicyCH9 states beyond the Built-Up Area Boundary development should reflect local character and distinctiveness. Therefore the principle of development in this area could therefore be acceptable subject to the detail of the proposal.”</p> <p>The acceptance of the principle of development on my clients land, subject to the detail of the proposal complying with the Development Guidance in the Development Brief (page 26) should therefore be recognised in the text.</p> <p>This is supported by Detailed Development Guidance for Worth Conservation Area page 32 “It is possible that smaller-scale proposals may come forward within the Conservation Area, and in addition to the policies above, the following guidance should be taken into account. The guidance goes into more detail regarding New Buildings which I have referred to earlier.</p>	<p>consistency with the Development Brief, corresponding wording has been added to the ‘New Buildings’ heading in the ‘Detailed Design Guidance for Worth Conservation Area’ section of the Conservation Area Statement.</p>
<p>Tony Fullwood Associates on behalf of the Bucknall Family</p>		<p>The Consultation Draft Worth Conservation Area Statement is a well written document which is important for setting the context for future development within the Conservation Area.</p>	<p>Noted.</p>
<p>Tony Fullwood Associates on behalf of the Bucknall Family</p>		<p>In this respect, it gives insufficient acknowledgement of the adopted Local Plan H2 allocation.</p>	<p>Local Plan Policy H2 allocates land in Worth Conservation Area as a Housing, Biodiversity and Heritage site. The allocated site, falling as it does within the Conservation Area, forms part of the setting of St. Nicholas’ Church. As required by the Local Plan Inspector, the H2 site is considered in detail through the Land East of Balcombe Road/</p>

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			Street Hill Development Brief, which provides guidance as to how the allocation site should come forward in accordance with the Local Plan policies. It is appropriate therefore that the Conservation Area Statement, whilst referencing the allocated H2 site, does not cover it in the same level of detail as a dedicated Development Brief.
Tony Fullwood Associates on behalf of the Bucknall Family		Indeed, the first Objective for Planning Policy and Proposals could undermine the Local Plan allocation. In this respect, the Statement could be seen to be in conflict with the adopted Local Plan.	The Conservation Area Statement is not in conflict with the adopted Local Plan. This is covered in detail in Mr Fullwood's representations, and the council's response is set out at REF18 below.
		The Draft Statement inaccurately suggests that the area has a rural character and setting.	Worth Conservation Area was designated in March 1987 in order to 'preserve and enhance the character of the setting of St. Nicholas' Church' and it is the designated Conservation Area boundary that defines its rural setting. This point is raised repeatedly in Mr Fullwood's representations, and the council's response is set out at REF1 and REF3 below.
		In its current form limited parts of the Statement are in conflict with the adopted Local Plan. These are listed in more detail in the Schedule of Objections. Detailed objections to the draft brief, together with proposed changes, are submitted as a Schedule of Objections.	Disagree. The Conservation Area Statement is in full conformity with the adopted Local Plan and the Land East of Balcombe Road/Street Hill Development Brief. This point is discussed at

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			various points in the council's detailed response below, in particular at REF1 and REF18 .
Tony Fullwood Associates on behalf of the Bucknall Family		Separate Schedule of Objections submitted, which are set out and responded to below.	CBC response set out below.

Tony Fullwood Associates on behalf of the Bucknall Family: Schedule of Objections.

Page No.	Consultation Draft Text	Objection	Proposed Change to Consultation Draft (Proposed deletion Proposed addition)
6	A key feature of Worth Conservation Area is its rural landscape character	<p>The scale of the Conservation Area, its proximity to modern settlement and associated infrastructure and its severance from the surrounding countryside by the motorway mean that it cannot be considered rural. The Conservation Area may include some of the characteristics similar to those of the wider rural area, but that is true of many suburban and semi-urban locations.</p> <p>Worth Way has a generally suburban character with some relatively recent houses, garages and driveways visible as part of the street scene.</p> <p>The Heritage Appraisal prepared by former Chief Planner at English Heritage, Stephen Bee states: 'The open land is not now in agricultural use either, being variously garden, paddock, motorway verge and landscaping, scrub and unused open land. The pockets of open land are not contiguous with a more extensive area of open countryside and should no longer be considered 'rural'.'</p> <p>It is important to recognise that the Local Plan Inspector refers to the 'semi-rural nature of the Conservation Area'.</p>	Amend text to either: A key feature of Worth Conservation Area is its rural landscape character or A key feature of Worth Conservation Area is its <i>semi-rural</i> landscape character
<p>CBC Response (REF1): Not accepted. Worth Conservation Area was designated in March 1987 in order to 'preserve and enhance the character of the setting of St. Nicholas' Church' and it is the designated Conservation Area boundary that defines its rural setting. The character of the Conservation Area is recognised as being rural within both the 1990 and 2003 versions of the Worth Conservation Area Statement. This position is further endorsed by Historic England, which through representations made to the Local Plan examination state that '<i>despite the growth of Crawley and the construction of the M23 in recent decades, the largely rural situation of Worth Church and open character of the conservation area has remained. The boundaries of the conservation area were drawn specifically to protect this isolated rural character</i>'.</p> <p>The council does not consider that the Worth Way has a character that could be described as 'suburban'. Worth Conservation Area is situated outside of Crawley's Built-Up Area Boundary, and is by definition a countryside location. Worth Way itself has a countryside character, being lined on either side by trees and hedges (figure 21 of Worth Conservation Area Statement refers), with the narrowing of Worth Way providing a strong sense of rural enclosure. The built form of the Conservation Area is clearly distinct from the suburban form inside Crawley's Built-Up Area Boundary. This is reflected by Local Plan</p>			

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	<p>Policy CH9 and endorsed in the Local Plan Inspector's Report (paragraph 57) which found the retention of the allocated Policy H2 site and properties along Church Road/Worth Way within the countryside, as opposed to including these within the Built-Up Area Boundary, to be the most appropriate and sound approach (in accordance with NPPF paragraph 182). Indeed, the Inspector (paragraph 50) finds there to be clear distinction between the character of the historic setting of St Nicholas' Church and the suburban housing of Maidenbower to the west. The age of the built form within the Conservation Area has no bearing on whether its character would be described as 'suburban'.</p> <p>In describing the rural character of the Worth Conservation Area, Worth Conservation Area Statement is consistent with the text of Local Plan Policy H2 (part i) which specifically refers to the rural character of Worth Conservation Area. This position is reiterated through the supporting text of Local Plan paragraph 6.54, which specifically refers to the need for development to respect <i>'the rural nature of the Conservation Area...that is clearly distinct from the suburban character of Maidenbower'</i>. This wording has been fully considered by the Local Plan Inspector and, having been stipulated in the Main Modifications Appendix of the Inspector's Report, was required to ensure the soundness of the Local Plan. It would therefore be contrary to the Local Plan to deviate from the description of the Conservation Area as rural, which is clearly established through the adopted Policy H2 wording and its supporting text, and the situation of Worth Conservation Area in a countryside location outside of Crawley's Built-Up Area Boundary.</p>		
6	<p>The historic St. Nicholas' Church, a Grade I Listed Building, is situated at the heart of the Conservation Area. The desire to preserve and enhance the character of its setting was the key reason for designating the Conservation Area in March 1987, and the unspoilt rural characteristics of its surrounds survives to the present day.</p>	<p>The surrounds of the church are not unspoilt rural characteristics which have survived from its origins to the present day. Although there is some open land and tree cover around the church and churchyard, this does not represent the character of the setting of the church at the time it was built, and is a consequence of mainly Nineteenth Century agriculture and Twentieth Century urban development. The open land is enclosed by Twentieth Century New Town residential and business development and the M23 motorway. The Local Plan Inspector summarises the evidence: 'As to its setting, the church was not part of a settlement but originally stood in a clearing in the Wealden forest, linked by paths to scattered small settlements. The original forest was cleared to make way for cultivated land which, in turn, has been replaced by the developing new town and the M23 motorway to the east, which separates Crawley from the surrounding countryside. Bishops Lodge and its grounds, the Old Rectory, and the open meadows, woodland and ponds which lie between the church and the potential housing site are all relatively recent. Thus the isolated woodland setting of the church has largely been lost and replaced by land uses which are mostly not associated with the church'.</p>	<p>The historic St. Nicholas' Church, a Grade I Listed Building, is situated at the heart of the Conservation Area. The desire to preserve and enhance the character of its setting was the key reason for designating the Conservation Area in March 1987, and the unspoilt rural characteristics of its surrounds survives to the present day.</p>

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<p>CBC Response (REF2): Disagree. The council has made clear its position that the character of Worth Conservation Area is rural and this is established through Local Plan Policy H2 and paragraph 6.54. The council's detailed comments in relation to this matter is set out at REF1 of this Consultation Statement.</p> <p>As noted, the Inspector states that 'As to its setting, the church was not part of a settlement but originally stood in a clearing in the Wealden forest'. It is this rural setting, as delineated by the Conservation Area boundary, and reflected in its countryside location outside of the Built-Up Area Boundary, that the Conservation Area status seeks to preserve and enhance. It is recognised that modern development has over time come forward outside, and to a lesser extent within, the Conservation Area boundary, particularly in the form of Crawley New Town and the M23. However, it should be noted, that the original Conservation Area designation was made having full regard both to the presence of Crawley New Town and the M23 motorway, and the argument that the presence of these developments has somehow diminished the Conservation Area setting since its designation is not accepted.</p> <p>It is acknowledged that some change has occurred over time within the Conservation Area, though this is not to such an extent that the integrity of its rural character has been compromised.</p>			
<p>Worth Conservation Area Statement Amended Wording</p> <p>Wording within the Statement is amended to reflect this, as follows: <i>The historic St. Nicholas' Church, a Grade I Listed Building, is situated at the heart of the Conservation Area. The desire to preserve and enhance the character of its setting was the key reason for designating the Conservation Area in March 1987, and the unspoilt rural characteristics of its surrounds survives to the present day.</i></p>			
10	<p>Introduction Worth Conservation Area is unique in a Crawley context, with its countryside setting providing a clear distinction from the built up area and road infrastructure that bound its east and west boundaries. Its rural character provides important context to the setting of St Nicholas' Church, the informal low density built form, and the designated and undesignated historic assets located in the</p>	<p>The Worth Conservation Area does not have a countryside setting, surrounded as it is by suburban development on three sides and a motorway to the east. Crawley Borough Council's own evidence (Local Plan Doc 057), Draft Landscape Character Assessment, October 2012 and Green Infrastructure SPD state in relation to Tilgate/Worth Forest and Fringes:</p> <p>'Character of the Urban Edge The M23 creates a negative edge that prevents a positive integrated relationship between Crawley and the countryside...Worth Way SNCI is the only green corridor within Crawley but does not cross the M23. The Local Plan Inspector correctly concluded: 'The original forest was cleared to make way for cultivated land which, in turn, has been replaced by the developing new town and the M23 motorway to the east, which separates Crawley from the surrounding</p>	<p>Introduction Worth Conservation Area is unique in a Crawley context, with its countryside setting has an urban setting. It's semi-rural character contrasts with providing a clear distinction from the built up area and road infrastructure that bound its east and west, north and south boundaries. It's The semi-rural character provides important context to the setting of St Nicholas' Church, the informal low density built form, and the</p>

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	<p>Conservation Area. It is the relationship between these features and the extensive rural wooded landscape to the east that defines the special character of Worth Conservation Area. These features are discussed in further detail below.</p>	<p>countryside.’ (emphasis added)</p> <p>The Conservation Area is enclosed by Twentieth Century New Town residential and business development and the M23 motorway. The Local Plan Inspector refers to ‘the semi-rural nature of the Conservation Area’ and this correct description should be included in the brief. It is important that the overall character of the Conservation Area is correctly described. Given the evidence and Inspector’s conclusion this paragraph should be amended.</p>	<p>designated and undesignated historic assets located in the Conservation Area. It is the relationship between these features and the extensive rural wooded landscape to the east that defines the special character of Worth Conservation Area. These features are discussed in further detail below.</p>
<p>CBC Response (REF3):</p> <p>The council has made clear its position that the character of Worth Conservation Area is rural and this is established through Local Plan Policy H2 and paragraph 6.54. The council’s detailed comments in relation to this matter is set out at REF1 and REF2 of this Consultation Statement.</p> <p>The Inspector found the built form of Church Road and Worth Way to in-keeping with the countryside character of Worth, and there is clear distinction between the rural loose-knit, low-density built form inside the Conservation Area, and the higher-density suburban development located within Crawley’s Built Up Area Boundary. The description of the landscape character of Worth Conservation Area as being rural within the Local Plan has been found sound by the Local Plan Inspector, and it would be contrary to the Local Plan to describe its character otherwise.</p> <p>The Landscape Character Assessment, October 2012 (not a draft document) indicates that the Worth Conservation Area character includes the SNCI, historic park and gardens, woodlands, listed buildings and tree preservation areas and that these all contribute to the area’s high landscape value. The Assessment provides a general statement indicating that the M23 is a barrier. However, this does not negate the relationship between the countryside at Worth (within Crawley’s administrative boundary) and the wider countryside to the east of the M23 beyond. Indeed, the Assessment recommends the integration of the Conservation Area and Worth Way SNCI into the countryside so as to improve links for the public and wildlife.</p> <p>Although Worth Conservation Area is of a special historic and rural character, it is accepted that this character cannot be described as unique, as Ifield Conservation Area also possesses attributes that relate to its rural character and wider historic interest. Text is amended accordingly.</p>			
<p><u>Worth Conservation Area Statement Amended Wording</u></p> <p>Text is amended as follows to reflect the delineated Built Up Area Boundary:</p> <p><i>Worth Conservation Area is unique special in a Crawley context, with its countryside setting location providing a clear distinction from the built up area to the west, north and south, and road infrastructure that bound its M23 to the east and west boundaries.</i></p> <p>Corresponding text amendments are made to remove reference to ‘unique’ at pages 6, 19, 29</p>			

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10	<p>Built Form</p> <p>The existing built form of Worth Conservation Area has remained largely unchanged, with sporadic, low-density buildings set largely to the north of St Nicholas' Church, depicting the character and detail of different periods in time.</p>	<p>The term unchanged is clearly inaccurate as there is no benchmark date and clearly some change has taken place. As the Statement itself says: '...depicting the character and detail of different periods in time.' As with any Conservation Area, the area has evolved over time and has accommodated new development along Worth Way, whilst a further 15 dwellings is allocated on land off Street Hill. Development is not sporadic. Rather it is generally clustered along the roads in the area. Nor is all development located north of the church with Bishops Lodge and the Old Rectory as well as the housing allocation located to the south.</p> <p>The text should be amended.</p>	<p>Built Form</p> <p>The existing built form of Worth Conservation Area has remained largely unchanged, with comprises sporadic, low-density buildings set largely to the north of St Nicholas' Church, depicting the character and detail of different periods in time. <i>Bishops Lodge and the Old Rectory as well as a housing allocation for a maximum of 15 dwellings are located to the south of the church.</i></p>
<p>CBC Response (REF4):</p> <p>The Conservation Area Statement states that the built form of the area has remained <u>largely</u> unchanged – clearly this is not stating that there has been no change whatsoever. Indeed, change within the Conservation Area is acknowledged in the text when it refers to development that has taken place in the Conservation Area '<i>depicting the character and detail of different periods in time</i>'.</p> <p>This section of the Conservation Area Statement discusses the <u>existing</u> built form of the Conservation Area as part of a detailed character appraisal. It is not necessary nor appropriate to refer to the allocation at the Local Plan Policy H2 site at this point in the document, particularly as the allocated site is discussed under Part 4 of the Conservation Area Statement and is subject to a separate Development Brief. It should be noted that the Local Plan Policy H2 site is not allocated solely for housing, and is also identified for biodiversity and heritage improvements that are required as part of the development.</p> <p>At no point does the Conservation Area Statement imply that <u>all</u> development is located north of the church. The text refers to '<i>sporadic, low-density buildings set <u>largely</u> to the north of St. Nicholas' Church</i>' and clearly this does not state that buildings are exclusively situated to the north of St. Nicholas' Church. It is accepted that the existing built form is largely grouped along the Worth Way, and the text is amended accordingly to reflect this.</p>			
<p>Worth Conservation Area Statement Amended Wording</p> <p>For consistency with the Inspector's wording, the term 'sporadic' is replaced with 'loose-knit'. For clarity, the paragraph is amended as below:</p> <p>The existing built form of Worth Conservation Area has remained largely unchanged, is one of with loose-knit sporadic, low-density buildings <u>in irregular plots, situated set</u> largely to the north of St Nicholas' Church, <u>grouped along and accessed from Worth Way</u>. <u>This depicts</u> the character and detail of different periods in time, This reveals and reinforces the designated heritage asset's <u>conservation area's</u> cultural and natural heritage values; how it is experienced, seen and relates to the surrounding landscape. Greater detail of the built form of the Worth Conservation Area is provided below.</p>			
12	The churchyard of St Nicholas	The Worth Conservation Area does not have a countryside setting,	The churchyard of St Nicholas is

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	<p>is integral to the context of the Conservation Area and its wider countryside setting, offering a feeling of quiet contemplation that reinforces the area's rural character. The churchyard is largely enclosed by mature trees, and contains a number of mature yew trees. A semi-circular path leads around the Church from east to west.</p>	<p>surrounded as it is by suburban development on three sides and a motorway to the east. Crawley Borough Council's own evidence (Local Plan Doc 057), Draft Landscape Character Assessment, October 2012 and Green Infrastructure SPD state in relation to Tilgate/Worth Forest and Fringes:</p> <p>Character of the Urban Edge The M23 creates a negative edge that prevents a positive integrated relationship between Crawley and the countryside...Worth Way SNC1 is the only green corridor within Crawley but does not cross the M23. The Local Plan Inspector correctly concluded: 'The original forest was cleared to make way for cultivated land which, in turn, has been replaced by the developing new town and the M23 motorway to the east, which separates Crawley from the surrounding countryside.' (emphasis added)</p> <p>The Local Plan Inspector refers to 'the semi-rural nature of the Conservation Area'. Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain.</p> <p>Detailed evidence at the Examination (Heritage Appraisal, Steven Bee the former Director of Planning at English Heritage) states: '4.16. As the English Heritage Setting guidance points out, the appreciation of historic significance is not just visual. A distinctive aspect of the original setting would have been its peaceful as well as remote setting. The dominant feature of the setting today is the noise of traffic on the M23. This is continually audible, and loud, from all parts of the churchyard, and to a lesser extent from within the church. 4.17. Even for those who may wish to contemplate the concept of the original setting of the church, the sound of the Motorway makes this very difficult.'</p> <p>Given the evidence and Inspector's conclusion, this paragraph should be amended.</p>	<p>integral to the context of the Conservation Area and its wider countryside setting, offering a feeling of quiet contemplation that reinforces the area's rural character. <i>provides the immediate setting for the Grade 1 listed building.</i> The churchyard is largely enclosed by mature trees, and contains a number of mature yew trees. A semi-circular path leads around the Church from east to west.</p>

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<p>CBC Response (REF5): This representation reiterates various points that have already been raised by the respondent and which have been addressed earlier in this Consultation Statement. It is not proposed to reiterate the council's response in full. Disagree that parts of the Worth Way could be described as suburban. The council has made clear its position that the character of Worth Conservation Area is rural and this is established through Local Plan Policy H2 and paragraph 6.54. The council has set out detailed comments in relation to this matter at REF1, REF2 and REF3 of this Consultation Statement. The council's response in relation to the Landscape Character Assessment and the M23 is set out at REF2 and REF3 of this Consultation Statement.</p> <p>With regards to the text amendments suggested in the representation, it should be noted that noise is just one of many attributes identified by Historic England as shaping the manner in which a heritage asset may be experienced. The Historic England document <i>The Setting of Heritage Assets</i> identifies a number of factors, notably including landscape, views towards the asset, tranquility and sense of enclosure, seclusion, intimacy or privacy. In this context it is questionable whether the dominant feature of the setting today can accurately be described as noise. The M23 was constructed prior to the designation of the Conservation Area, and motorway noise has long been a factor in how the asset is experienced. This is not sufficient in itself to diminish the value of the asset or the perception of tranquility it engenders.</p> <p>As discussed at REF1 and REF2 of this Consultation Statement, it is the Conservation Area in its entirety that provides the setting of St. Nicholas' Church, hence the original Conservation Area designation. Therefore, it is not necessary nor appropriate to add text that inaccurately seeks to restrict this setting to the churchyard.</p>			
<p>Worth Conservation Area Statement Amended Wording</p>			
<p>It is accepted that motorway noise can be audible and the text as amended as follows: '<i>The churchyard of St Nicholas is integral to the context of the Conservation Area and its wider countryside setting, offering a feeling of quiet tranquil contemplation that reinforces the area's rural character</i>'.</p>			
14	Street House	The owner of the listed building considers the description slightly inaccurate and wishes to see specific amendments.	<p>Street House Street House is a Grade II Listed Building of 17th century, or earlier, origin. It is much altered inside. The timber-framed walls had a red brick infilling, but most of the ground floor was refaced with brick and the first floor is partly wholly covered with weather-boarding. The roof is covered with Horsham slabs.</p>

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			According to the Victoria County history, 'one door in the west front is ancient and the room inside has exposed chamfered ceiling joints. The building is said to have been an inn and this was the tap room'. There are casement windows, a modern gabled porch and bay windows on each side of it on the ground floor. The access area to Street House and the churchyard has a <i>double small carriage circle and a triangular green space off Church Road.</i>
<p>CBC Response (REF6): The description of Street House provided in the Conservation Area Statement reflects the wording set out in the Historic England listed building entry. The building owners are advised to contact Historic England to request that its listing is updated, and subject to any amendment to the listing by Historic England, a corresponding change can be made to the Worth Conservation Area Statement to describe the weather-boarding.</p> <p>The carriage circle and triangular green space are not referred to in the listing, and it is not therefore necessary to liaise with Historic England. The approach road to the Church is of critical importance to the character of the Conservation Area, particularly where it fans out in front of Street House and the Church Lychgate. Amendments have been made to the Conservation Area Statement text to clarify the features of this road in relation to the Listed Buildings.</p>			
<p>Worth Conservation Area Statement Amended Wording</p> <p>Amendments have been made to the Conservation Area Statement text to clarify the features of Church Road access lane in relation to the Listed Buildings: <i>The access area to Street House and the churchyard has is characterised by key features which include the rural nature of the approach lane, a small carriage circle and a triangular green space off Church Road.</i></p>			
15	<p>Other Buildings There are several other buildings in the Conservation Area, including the Bishops</p>	<p>The traditional house styles are generally of two storey buildings, and this should be emphasised in the text.</p> <p>It is not the plot shapes which are determining the layout of development in the Conservation Area which tends to be arranged along the road</p>	<p>Other Buildings There are several other buildings in the Conservation Area, including the Bishops Lodge and</p>

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	<p>Lodge and the Old Rectory, Fieldgate, Beaumont Cottage, Bushend and several dwellings along Worth Way. These are large detached dwellings of traditional styles of one to two storeys in height. Dwellings are situated on irregular plots, well separated from one another, which contributes to a low-density rural character. Although these are not listed, they nonetheless make an important contribution to the overall character of the area.</p>	<p>frontage. It is therefore not the plot shapes which are important to the character of the Conservation Area.</p> <p>The Local Plan Inspector refers to 'the semi-rural nature of the Conservation Area'. Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain. It is important that the overall character of the Conservation Area is correctly described.</p>	<p>the Old Rectory, Fieldgate, Beaumont Cottage, Bushend and several dwellings along Worth Way. These are large detached dwellings of traditional styles of one to <i>generally</i> two storeys in height. Dwellings are situated on irregular plots, well separated from one another, which contributes to a low-density rural character. Although these are not listed, they nonetheless make an important contribution to the overall character of the area.</p>
<p>CBC Response (REF7): The first point re: building heights is noted and the text is amended accordingly.</p>			
<p><u>Worth Conservation Area Statement Amended Wording</u></p>			
<p>The text as amended as follows: <i>These are large detached dwellings of traditional styles of one to generally two storeys in height.</i></p>			
<p>CBC Response (REF7a): Do not agree with the point regarding plot shapes. It is a factual position that the existing built form within the Conservation Area is situated on large, irregularly shaped plots. The Inspector's Report refers to the loose-knit, low density built form of the area, finding that development should reflect this to remain in-keeping with the character of the Conservation Area. Plot size, shape and separation between dwellings are all key features that contribute to the low-density loose-knit development pattern within the Conservation Area. Text has been amended to add the term 'loose-knit' to the paragraph.</p>			
<p><u>Worth Conservation Area Statement Amended Wording</u></p>			
<p>For consistency with the Inspector's wording, the term 'loose-knit' is inserted: <i>Dwellings are situated on irregular plots, well separated from one another, which contributes to a low-density, loose-knit rural character.</i></p>			
<p>CBC Response (REF7b): Disagree that parts of the Worth Way could be described as suburban. The council has set out detailed comments on this matter at REF1 and REF3 of</p>			

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	this Consultation Statement. To reiterate,	the age of the built form within the Conservation Area has no bearing on whether its character would be described as 'suburban' or not.	
18/19	<p>Setting of St Nicholas' Church Landscape setting and relationship with built form The special character of Worth Conservation Area stems from its preservation over time and the important landscape context this provides to the significance of St Nicholas' Church. Worth is characterised by its sense of rurality, and the manner in which its countryside and mature trees form a natural setting to the historic St Nicholas' Church. This provides important landscape context to the church, telling the story of its development in the forest and its role in serving the settlements of the Weald. Worth's Conservation Area boundaries are designated specifically to protect the setting of St Nicholas' Church within the context of its concealed rural character. Setting should be considered as both perceived and</p>	<p>It is important to note that this section is describing the setting of St Nicholas' Church and that not all of the Conservation Area is part of that setting. Whilst it is accepted that the immediate landscape setting (the church yard and associated trees) is important to the significance of the church, the wider landscape does not add to the church's historic significance. Detailed evidence at the Local Plan Examination (Heritage Appraisal, Steven Bee the former Director of Planning at English Heritage) addressed specifically the historic significance of the open land and tree cover and the public routes and their contribution to the setting of St Nicholas' Church. '4.7. The historic significance of the church's isolated location has been eroded over time. The forest within which it was built had been cleared from the immediate surroundings of the church by the time of the first map of the area, (Gardner and Gream 1797) and replaced by farmland. The forest remained only to the south on poorer, higher ground. There was also by this time a scatter of buildings around the church and along the nearby lanes. 4.8. During the Nineteenth Century the extent of cultivated land increased, and the connection of the area to the surviving wooded land was finally severed by the construction of the M25 in the 1970s. 4.9. Residential and associated development increased through the Nineteenth and Twentieth Centuries to the north and west, accelerating after World War II when Crawley was designated a New Town and Gatwick expanded to become one of London's three main airports. 4.10. Although there is some open land and tree cover around the church and churchyard, this does not represent the character of the setting of the church at the time it was built, and is a consequence of</p>	<p>Landscape setting and relationship with built form The special character of Worth Conservation Area stems from its preservation over time and the important landscape context this provides to the significance of St Nicholas' Church. Worth is characterised by its sense of rurality, and the manner in which its countryside and mature trees which surround the Conservation Area and form a natural setting to the historic St Nicholas' Church. This provides important landscape context to the church, telling the story of its development in the forest and its role in serving the settlements of the Weald although the forest setting and historic context has been lost. Worth's Conservation Area boundaries are designated specifically to protect the setting of St Nicholas' Church within the context of its concealed rural character. although it is important to note that not all parts of the Conservation Area form part of the setting of the church.</p>

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	<p>tangible, and although far reaching views are restricted, knowledge of the rural characteristics of the area are sufficient to sustain a sense of place and retain the historical context of the landscape and built form. The sense of place surrounding the Church is tangible, its presence revealed when leaving the wooded path and arriving in the clearing immediately surrounding the church and thus its historical context has been retained. The rural landscape setting of St. Nicholas' Church is key to the way in which the asset is experienced, and it turn, how this affects the understanding of historic development or function of historic places.</p> <p>Although the area is enclosed by modern urban settlement and associated infrastructure, its characteristics retain those of the rural landscape to the east, with mature trees and established hedging, large areas of open grassland, managed woodland, parkland and scattered buildings of</p>	<p>mainly Nineteenth Century agriculture and Twentieth Century urban development. The open land is enclosed by Twentieth Century New Town residential and business development and the M23 motorway.</p> <p>4.11. The open land is not now in agricultural use either, being variously garden, paddock, motorway verge and landscaping, scrub and unused open land. The pockets of open land are not contiguous with a more extensive area of open countryside and should no longer be considered 'rural'.</p> <p>4.12. There are virtually no views of the church from public vantage points, even in winter, and the houses visible from within the churchyard compromise any appreciation of its historic isolated location within.</p> <p>4.13. The only views of open land in the vicinity of the church are: to the north of Worth Way, looking away from the church and towards recent suburban housing development; and looking south from Church Road across the scrubland towards the proposal site which is effectively hidden by the sloping topography. Longer views of the tree cover to the east of the church can only be appreciated from Worth Way to the east, where the foreground is dominated by the view and noise of the M23.</p> <p>4.14. Users of Worth Way approaching from the east will have passed through countryside, but the approach to the site is over the M23 and past a housing estate and several large houses. The M23 runs north-south to the east of the churchyard. The motorway is not visible from the churchyard, and the Victorian spire of the church is only just visible, in winter, from the motorway in glimpsed views from the south west.</p> <p>4.15. Approaches on foot or by vehicle from the west are through urban areas of Crawley, with a restricted long view of from Church Road followed by the relatively modern suburban residential character along this route approaching the church. Any physical perception of the historic open setting of the church is negligible.</p>	<p>Setting should be considered as both perceived and tangible, and although far reaching views are restricted, knowledge of the rural characteristics of the area are sufficient to sustain a sense of place and retain the historical context of the landscape and built form. The sense of place <i>immediately</i> surrounding the Church is tangible, its presence revealed when leaving the wooded path and arriving in the clearing immediately surrounding the church and thus its historical context has been retained. The rural landscape setting of St. Nicholas' Church is key to the way in which the asset is experienced, and it turn, how this affects the understanding of historic development or function of historic places.</p> <p>Although the area is enclosed by modern urban settlement and associated infrastructure, its characteristics retain those of the rural landscape to the east, <i>it retains pockets of open land</i> with mature trees and established hedging, large areas of open grassland, managed woodland, parkland and scattered buildings of</p>

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	<p>rural form set within large plots.</p> <p>There is a clear visual transition from the urban settlement to the west and the rural countryside to the east, which provides setting and context to the designated heritage assets of St Nicholas' Church, the lychgate, Street House and Toll House. The rural setting also provides context to other heritage assets, including local archaeologically sensitive areas, such as the moated medieval building to the south of the site and site of the former Worth Rectory (adjacent to Bishop's Lodge) as well as undesignated park and gardens associated with Bishops Lodge including an area of managed woodland.</p> <p>The character of the area is rural and its sense of place is defined by its remaining woodland, woodland pastures, species rich grasslands, hedgerows and traditional buildings. This contributes</p>	<p>4.16. As the English Heritage Setting guidance points out, the appreciation of historic significance is not just visual. A distinctive aspect of the original setting would have been its peaceful as well as remote setting. The dominant feature of the setting today is the noise of traffic on the M23. This is continually audible, and loud, from all parts of the churchyard, and to a lesser extent from within the church.</p> <p>4.17. Even for those who may wish to contemplate the concept of the original setting of the church, the sound of the Motorway makes this very difficult.</p> <p>4.18 ...The use of land in the vicinity has changed over time, and continues to do so. The setting beyond the churchyard, apart from the presence of Street House and possibly the remains of the former Rectory and garden, makes no positive contribution to our appreciation of the church's historic significance.</p> <p>4.19. Nonetheless, the historic significance of the church, derived now primarily from its aesthetic and illustrative historic value together with the remaining associative and communal value, as described in Section 3, remains high.'</p> <p>'3.16. Breaks in the hedgerow along the south side of Church Road allow some views across the open scrub land that slopes steeply away to the south. Whatever amenity value this might offer, its historic significance is restricted to minor aesthetic heritage value, representing the open land referred to in the Conservation Area Statement. This land, and the view, are no longer physically or functionally associated with the church and does not contribute to its historic significance.'</p> <p>This evidence was accepted by the Local Plan Inspector who, in relation to the housing allocation states:</p> <p>'Thus the isolated woodland setting of the church has largely been lost and replaced by land uses which are mostly not associated with the</p>	<p>rural form set within large plots. <i>Not all open areas within the Conservation Area form part of the setting of the church.</i></p> <p>There is a clear visual transition from the urban settlement to the west, <i>north and south</i> and the rural countryside to the east, which provides setting and context to the designated heritage assets of St Nicholas' Church, the lychgate, Street House and Toll House. The rural <i>transitional</i> setting also provides context to other heritage assets, including local archaeologically sensitive areas, such as the moated medieval building to the south of the site and site of the former Worth Rectory (adjacent to Bishop's Lodge) as well as undesignated park and gardens associated with Bishops Lodge including an area of managed woodland.</p> <p>The character of the area is <i>semi-rural</i> and its sense of place is defined by its remaining woodland, woodland pastures, species rich grasslands, hedgerows and traditional buildings. This</p>

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	<p>greatly to Worth's sense of place as a location that is rich in history, and which has remained largely unchanged even as development has taken place around it. It is this preservation of the rural setting, and the manner in which it provides an unspoilt landscape context to St Nicholas' Church and other historic features, that is so important in forming Worth's unique historic context as Conservation Area.</p>	<p>church, though the former Rectory garden has some significance as an illustration of how the setting of the church has changed over time.</p> <p>The potential housing site is not visible from the church or churchyard, whilst any fleeting glimpses of the church spire from the site would only be possible through the intervening trees in winter. Consequently, some limited development would not harm the appreciation and experience of the church, nor would the heritage values that define the historic significance of the church in its current setting be significantly affected.'</p> <p>The Local Plan Inspector refers to 'the semi-rural nature of the Conservation Area'. Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain. It is important that the overall character of the Conservation Area is correctly described.</p> <p>The term unchanged is clearly inaccurate as there is no benchmark date and clearly some change has taken place. As the Statement itself says: '...depicting the character and detail of different periods in time.'</p> <p>The text should be amended to reflect the evidence and Inspector's conclusions.</p>	<p>contributes greatly to Worth's sense of place as a location that is rich in history, and which has remained largely unchanged even as development has taken place around it. It is this preservation of the rural setting, and the manner in which it provides an unspoilt landscape context to St Nicholas' Church and other historic features, that is so important in forming Worth's unique historic context as Conservation Area.</p>

CBC Response (REF8):

The points above, in relation to the designation of the Conservation Area and the rural character and setting of the Conservation Area in the context of the Listed Church, have been raised previously in this representation and have been responded to earlier in this Consultation Statement. In particular, **REF1, REF2, REF3, REF4**)

Disagree that parts of the Worth Way could be described as suburban. The council has set out detailed comments on this matter at **REF1** of this Consultation Statement.

It is neither necessary nor appropriate to amend the Conservation Area Statement text in a manner that inaccurately seeks to restrict the setting of St. Nicholas Church to its immediate churchyard. This is discussed at **REF1** and **REF3** in further detail. A minor amendment has been agreed in relation to the introductory text for the Conservation Area Statement, and additional wording has been added to the Part 2 of the Conservation Area Statement (*20th Century to Present*) to reiterate and clarify the purpose of the Conservation Area designation and geographical extent.

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Worth Conservation Area Statement Amended Wording			
Wording on page 6 of the Conservation Area Statement has been amended to reflect that some change has occurred within the Conservation Area over time, as follows (and as set out at REF2 of this Consultation Statement):			
<i>The historic St. Nicholas' Church, a Grade I Listed Building, is situated at the heart of the Conservation Area. The desire to preserve and enhance the character of its setting was the key reason for designating the Conservation Area in March 1987, and the unspoilt rural characteristics of its surrounds survives to the present day.</i>			
Additional new wording inserted into 'Part 2: History of Worth Conservation Area' of the Conservation Area Statement (20th Century to Present) to clarify the purpose of the Conservation Area boundaries:			
<i>Worth was designated a Conservation Area by Crawley Borough Council in March 1987, recognising the need 'to preserve and enhance the character of the area surrounding the Parish Church of St Nicholas, Worth, one of the finest Saxon buildings in England'. Despite the growth of Crawley and the construction of the M23 in recent decades, the largely rural situation of Worth Church and open character of the Conservation Area has remained. The boundaries of the Conservation Area were drawn specifically to protect this rural character.</i>			
21	Land to the south of St Nicholas' Church is identified as a Site of Nature Conservation Importance (SNCI), having been designated in May 1992. Like the wider Conservation Area landscape, it is rural in nature, and encompasses several habitats in a relatively small area, including relatively species-rich meadows, neutral grassland, pond, scrub, semi-natural woodland and a stream. The site remains of biodiversity value, particularly for its fine and coarse grassland habitats. It retains high potential to support bats and breeding	It is unclear how biodiversity value, especially one not related to historic landscape, relates to the special architectural or historical value of the Conservation Area. The SNCI only relates to part of the Conservation Area and should be assessed in relation to the features which contribute to the character of the Conservation Area. Indeed, the section repeats earlier description of 'rural nature' and grasslands which it is accepted can in part be developed. Omit.	Land to the south of St Nicholas' Church is identified as a Site of Nature Conservation Importance (SNCI), having been designated in May 1992. Like the wider Conservation Area landscape, it is rural in nature, and encompasses several habitats in a relatively small area, including relatively species-rich meadows, neutral grassland, pond, scrub, semi-natural woodland and a stream. The site remains of biodiversity value, particularly for its fine and coarse grassland habitats. It retains high potential to support bats and breeding birds and maintains the potential for

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	birds and maintains the potential for improvement and enhancement through appropriate long-term management.		improvement and enhancement through appropriate long-term management.
<p>CBC Response (REF9): The Site of Nature Conservation Importance designation recognises the biodiversity value of a significant parcel of land within the Conservation Area. Given that this land contributes to the rural character of the defined Conservation Area boundary, and therefore forms part of the overall setting to St. Nicholas' Church, the council believes that it is entirely appropriate for the Conservation Area Statement to discuss the designation.</p> <p>The Conservation Area Statement does not dispute that part of the SNCI is allocated in the Local Plan as a Housing, Biodiversity and Heritage site. The Local Plan Inspector considered the securing of improvements to the SNCI to be important, as reflected at paragraph 54 of his report, which states: <i>'Consequently there is considerable force to the argument that proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested, thereby mitigating the harm caused by the loss of part of the meadow. This would be secured as part of the development by a comprehensive and binding management plan which would also ensure the necessary protection and/or mitigation for any protected species found on the site'</i>. Through this allocation much of the SNCI is to be retained, restored and enhanced. This will continue to ensure it remains as a feature of the Conservation Area into the future.</p>			
21	This may indicate that there was at the time a link through the historic garden, between the woodland plantation, associated with the old Rectory and gardens, and the moat.	<p>In relation to the allocated housing site, the Local Plan Inspector states: <i>'...evidence of whether the site was part of the historic garden associated with the former Rectory is inconclusive. There are no obvious landscape features typical of an historic park or garden on the site today.'</i></p> <p>The quoted source commissioned by my client (Archaeology South East, 2015) actually states <i>'5.11 The Ordnance Survey Map of 1873-74 (Fig. 7) ...shows a pathway linking this wooded area to the moat which appears to lead to a small bridge that crosses the north east corner of the moat. This may indicate that at this time there was a link through the site between the historic garden and the moat.'</i></p> <p>As the extent of the park and garden is not evidenced, there can be no convincing evidence which shows that the link was through it.</p> <p>The text should be amended.</p>	This may indicate that there was at the time a link through the historic garden , between the woodland plantation, associated with the old Rectory and gardens, and the moat.

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<p>CBC Response (REF10): The Historic Park and Garden is a Local Plan designation is based on independent assessment carried out by Sussex Gardens Trust. The Inspector had no issue with the designation at Local Plan examination, hence the inclusion of Policy CH17 as part of a sound and adopted Local Plan. The extent of the Historic Park and Garden is shown on the Local Plan Map, and the historic link is shown to pass through this area. As such, it is not proposed to amend the text as suggested.</p>			
22	These views are fundamental to the rural character of the Conservation Area as they emphasise the contrast with the adjacent urban area, as can be seen in the example below.	The Local Plan Inspector refers to the semi-rural nature of the Conservation Area. Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain. It is important that the overall character of the Conservation Area is correctly described.	These views are fundamental to the <i>semi-rural</i> character of the Conservation Area as they emphasise the contrast with the adjacent urban area, as can be seen in the example below.
<p>CBC Response (REF11): The point above, in relation to the rural character of the Conservation Area, has been raised previously in this representation and has been responded to earlier in this Consultation Statement. In particular, REF1, REF2, REF3 Disagree that parts of the Worth Way could be described as suburban. The council has set out detailed comments on this matter at REF1 and REF3 of this Consultation Statement.</p>			
23	2. Views north-east/south-west along Worth Way at the north-eastern corner of the Conservation Area. Not dissimilar from view no.1, this view emphasises the Conservation Area's rural character and in particular, the narrowing of Worth Way provides a strong sense of rural enclosure which is lined on either side by trees and hedges. Loose-knit detached dwellings on large plots run to the south of Worth Way.	Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain. The Local Plan Inspector refers to the semi-rural nature of the Conservation Area. The text requires amendment to accurately reflect the character of the Conservation Area.	2. Views north-east/south-west along Worth Way at the north-eastern corner of the Conservation Area. Not dissimilar from view no.1, this view emphasises the Conservation Area's rural character and in particular, the narrowing of Worth Way provides a strong sense of rural-enclosure which is lined on either side by trees and hedges. Loose-knit detached dwellings on large plots run to the south of Worth Way.

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<p>CBC Response (REF12): Disagree that parts of the Worth Way could be described as suburban. The council has set out detailed comments on this matter at REF1 and REF3 of this Consultation Statement. The age of the built form within the Conservation Area has no bearing on whether its character would be described as 'suburban'.</p> <p>The point above, in relation to the designation of the Conservation Area and the rural character and setting of the Conservation Area in the context of the Listed Church, has been raised previously in this representation and has been responded to earlier in this Consultation Statement. In particular, REF1, REF2, REF3.</p>			
23	<p>3. View north into Worth Conservation Area from Maidenbower Business Park. Mature trees screen the southern edge of the Conservation Area, lining the banks of the Gatwick Stream. The spire of St. Nicholas' Church can be viewed through the trees in winter.</p>	<p>As the photograph demonstrates, there is no view of the spire from the public domain. Indeed the view between the bulky business units from the public domain is not on the same axis as the spire. Omit.</p>	<p>3. View north into Worth Conservation Area from Maidenbower Business Park. Mature trees screen the southern edge of the Conservation Area, lining the banks of the Gatwick Stream. The spire of St. Nicholas' Church can be viewed through the trees in winter.</p>
<p>CBC Response (REF13): The Inspector's wording states that '<i>... any fleeting glimpses of the church spire from the site would only be possible through the intervening trees in winter</i>'. The Conservation Area Statement text has been amended for consistency with the Inspector's Report. Figure 21 view axis amended accordingly.</p>			
23	<p>4. View north into Worth Conservation Area. Mature trees screen the medieval moat from view and markedly differentiate the rural Conservation Area from surrounding suburban and light industrial development.</p>	<p>The Local Plan Inspector refers to the semi-rural nature of the Conservation Area. The text requires amendment to accurately reflect the character of the Conservation Area.</p>	<p>4. View north into Worth Conservation Area. Mature trees screen the medieval moat from view and markedly differentiate the <i>semi-</i> rural Conservation Area from surrounding suburban and light industrial development.</p>
<p>CBC Response (REF14): The point above, in relation to the rural character and setting of the Conservation Area, has been raised previously in this representation and has been responded to earlier in this Consultation Statement. In particular, REF1, REF2, REF3. The suggested text amendment is rejected.</p>			

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24	8. View south into Historic Park & Garden from Church Road, Worth. Looking due south from the western part of Church Road, the landscape is heavily wooded with a rich mix of planting. A gentle downward slope is discernible through the planting and the outline of distant landscapes can be seen as a result of the unbuilt nature of the area. Meanwhile, the motorway and existing urban development are hidden from view, giving the Conservation Area its most continual countryside feel.	Text needs to make clear that views are across the valley to distant landscape which can be seen as a result of the topography, not the unbuilt nature of the area as the lower slopes of the valley are not perceived and are invisible in this view. This gives the accurate context for the housing site allocation within the adopted Local Plan.	8. View south into Historic Park & Garden from Church Road, Worth. Looking due south from the western part of Church Road, the landscape is heavily wooded with a rich mix of planting. A gentle downward slope is discernible through the planting and the outline of distant landscapes can be seen as a result of the unbuilt nature of the area foreground and the topography which means that the lower slopes of the valley are not perceived and are invisible in this view. Meanwhile, the motorway and existing urban development are hidden from view, giving the Conservation Area its most continual countryside feel.
<p>CBC Response (REF15): This statement refers to the existing view south from Church Road. The text seeks to highlight the countryside character of the Conservation Area, including the view of land to the south, and has been amended to more accurately describe this view point location.</p>			
<p>Worth Conservation Area Statement Amended Wording</p>			
<p>Text relating to Valued View 8 has been amended as follows: <i>View south into Historic Park & Garden from Church Road, Worth. Looking due south from the western part of Church Road, the landscape is heavily wooded with a rich mix of planting. The motorway and existing urban development <u>beyond the Conservation Area</u> are hidden from view, and the gentle downward slope discernible through the planting enables the outline of distant landscapes can be seen. as a result of the unbuilt nature of the area. Meanwhile, giving the Conservation Area its most continual countryside feel.</i></p>			
24	10. Looking south east towards Street House from Worth Way. The spire of St. Nicholas'	View is incorrectly shown on the map as it clearly is of the view showing the front facade of Street House and the spire above.	Correct View 10 on the map.

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	Church is a discernible focal point behind Street House and set amongst the verdant landscape.		
CBC Response (REF16): Noted. Diagram has been amended accordingly.			
<u>Worth Conservation Area Statement Amended Wording</u>			
Figure 21: Valued Views to/from/within Worth Conservation Area – View 10 marker moved to correct position on map to coincide with the image and text description.			
24	13. View east to St Nicholas' Church from the junction of Street Hill and Church Road. This strong axial view terminates at Street House and provides direct linear views into the characteristic heart of the Conservation Area. As the viewer progresses along Church Road, the spire of St Nicholas' Church becomes visible.	As the text which follows indicates, this title is inaccurate. View from the junction is of Street House	13. View east to St Nicholas' Church Street House from the junction of Street Hill and Church Road.
CBC Response (REF17): Agree. Text amended as suggested.			
<u>Worth Conservation Area Statement Amended Wording</u>			
Text describing Valued View 13 amended as follows:			
13. View east to St Nicholas' Church Street House from the junction of Street Hill and Church Road.			
29	Objectives for Planning Policy and Proposals Worth Conservation Area. The key objectives of the	The planning objectives cannot be set without reference to the Local Plan housing allocation within the Conservation Area. There is an absence of recognition in the Statement that the Inspector recognised that the development would cause some harm to, for example, grasslands, the	Objectives for Planning Policy and Proposals Worth Conservation Area. The key objectives of the Worth Conservation Area are to:

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	<p>Worth Conservation Area are to:</p> <p>- Preserve and enhance the character and rural setting of St Nicholas' Church as defined by the conservation area boundary. This includes protecting the locally designated Historic Park & Garden, SNCI, woodland, hedgerows and pastures/species rich grasslands from development that would be inappropriate and out of scale, character and appearance with the rural setting, which is itself so important in forming the unique historic setting of the church.</p>	<p>locally designated Historic Park & Garden etc. but considered that this was outweighed by the need for housing and the associated heritage and environmental benefits which would accrue as a result of this development.</p> <p>See previous detailed evidence and comments regarding the setting of the church. The entire Conservation Area clearly does not provide the setting for the church, nor can its setting be described as rural.</p> <p>The Local Plan Inspector refers to the semi-rural nature of the Conservation Area. Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain.</p> <p>The Local Plan Inspector summarises the evidence: 'As to its setting, the church was not part of a settlement but originally stood in a clearing in the Wealden forest, linked by paths to scattered small settlements. The original forest was cleared to make way for cultivated land which, in turn, has been replaced by the developing new town and the M23 motorway to the east, which separates Crawley from the surrounding countryside. Bishops Lodge and its grounds, the Old Rectory, and the open meadows, woodland and ponds which lie between the church and the potential housing site are all relatively recent. Thus the isolated woodland setting of the church has largely been lost and replaced by land uses which are mostly not associated with the church'. The text must be modified to accurately reflect evidence and the Inspector's conclusions.</p> <p>It is unclear how biodiversity value, especially one not related to historic landscape, relates to the special architectural or historical value of the Area. The SNCI only relates to part of the Conservation Area and should be assessed in relation to the features which contribute to the character of the Conservation Area. Indeed, the section repeats earlier description of 'rural mature' and grasslands. Omit.</p> <p>It is simply not possible to protect all species rich grasslands from development following the Policy H2 housing allocation. The Inspector</p>	<p>- Preserve and enhance the character and rural setting of St Nicholas' Church as defined by the conservation area boundary. This includes protecting locally designated Historic Park & Garden, SNCI, woodland, hedgerows and pastures/species rich grasslands from development that would be inappropriate and out of scale, character and appearance with the rural setting, which is itself so important in forming the unique historic setting of the church.</p>

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		<p>accepted the loss of grassland on the housing allocation but in mitigation sought enhancements over the remaining undeveloped area:</p> <p>‘Consequently there is considerable force to the argument that proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested, thereby mitigating the harm caused by the loss of part of the meadow.’</p> <p>Nor is it possible to protect the locally designated Historic Park & Garden from development following the Policy H2 housing allocation. The Inspector found evidence of whether the site was part of the historic garden associated with the former Rectory inconclusive and cites no obvious landscape features typical of an historic park or garden on the housing site today.</p> <p>It would appear that this objective is seeking to supersede the Local Plan. This Statement cannot in law supersede the Local Plan.</p> <p>Amendments are required to this Objective to recognise the Inspector’s conclusions and the full policy context which forms the background to this Statement.</p>	
<p>CBC Response (REF18):</p> <p>The Conservation Area Statement specifically refers to the Local Plan allocation as a Housing, Biodiversity and Heritage Site. The Conservation Area Statement is consistent with the adopted Local Plan, and clearly cannot supersede it: nor does it attempt to. The planning objectives in the Conservation Area Statement seek to preserve and enhance the character and rural setting of St. Nicholas’ Church as defined by the Conservation Area boundary, and this includes protecting it from development that would be inappropriate and out of scale, character and appearance with its rural setting.</p> <p>Local Plan Policy H2 allocates an area of land as a Housing, Biodiversity and Heritage Site, with Local Plan paragraph 6.54 recognising that heritage and environmental constraints must be carefully considered and addressed as part of any planning application on the allocated site. As required by the Planning Inspector, the Local Plan allocation supports development that respects the setting of Worth Conservation Area outside the built up area and its rural character, subject to heritage and biodiversity improvements also being delivered. Were development to be proposed that is inconsistent with the rural character of the Conservation Area or damaging to the site’s important assets, without first seeking to minimise the harm caused and without</p>			

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	<p>providing mitigation and/or compensation for the loss, this would be contrary to the Local Plan, the Development Brief and the Conservation Area Statement. All three documents are consistent in this regard.</p> <p>The council agree that the objectives as stated in the draft Worth Conservation Area Statement could be amended to better clarify the Inspector's view, as set out below.</p> <p>The other issues in the representation are a repetition of points raised previously by the respondent, which have been discussed elsewhere in this Consultation Statement:</p> <ul style="list-style-type: none"> • rural character: REF1, REF2, REF3; • alleged suburban nature of the Worth Way: REF1, REF3; • development of the New Town and M23 motorway: REF2, REF3; • role of the SNCI: REF3, REF9; and • the Historic Park and Garden designation: REF3, REF10. 		
	<p><u>Worth Conservation Area Statement Amended Wording</u></p> <p>The first two objectives have been amended to read:</p> <ul style="list-style-type: none"> - Preserve and enhance the character and rural setting of St Nicholas' Church as defined by the Conservation Area boundary. This includes protecting the locally designated Historic Park & Garden, SNCI, woodland, hedgerows and pastures/species rich grasslands. from development that would be inappropriate and out of scale, character and appearance with the rural setting, which is itself so important in forming the unique historic setting of the church. - Retain the historic, irregular, loose-knit and low density character of the built form of the area., <u>avoiding development that would be out of scale, character and appearance with the rural setting, which is itself so important in forming the unique historic setting of the Church.</u> 		
31	<p>Local Plan Policy H2: Housing, Biodiversity, and Heritage Site A parcel of land within the southern part of the Conservation Area, measuring around 1.8 hectares and referred to as Land East of Balcombe Road/Street Hill, is allocated in the Crawley Borough Local Plan as a</p>	<p>The housing allocation measures approximately 1.8ha but not the entire Housing, Biodiversity, and Heritage Site allocation as indicated.</p> <p>It is unclear how biodiversity value, especially one not related to historic landscape, relates to the special architectural or historical value of the Area. The SNCI only relates to part of the Conservation Area and should be assessed in relation to the features which contribute to the character of the Conservation Area. Omit.</p>	<p>Local Plan Policy H2: Housing, Biodiversity, and Heritage Site A parcel of land within the southern part of the Conservation Area, measuring around 1.8 hectares and referred to as Land East of Balcombe Road/Street Hill, is allocated <i>for a maximum of 15 dwellings</i> in the Crawley Borough</p>

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	Housing, Biodiversity and Heritage site. The allocation site includes part of the designated Historic Park & Garden and the designated SNCI.		Local Plan as a Housing, Biodiversity and Heritage site. The allocation site includes part of the designated Historic Park & Garden and the designated SNCI.
<p>CBC Response (REF19): Disagree. The confusion relating to which part of the allocation is being referred to in this section is acknowledged. This has been caused by the reference to the size and location of the smaller “indicative key housing site” within the wider site allocation.</p> <p>However, the council do not consider the request to remove reference to the Housing, Biodiversity and Heritage site from the Conservation Area Statement as the appropriate solution to resolve this confusion. This is the precise wording used by Local Plan Policy H2, and the proposed deletion is not accepted.</p> <p>The representation also seeks to include additional text within the Conservation Area Statement to indicate that the site is allocated for ‘a maximum of 15 dwellings’. The Local Plan allocation does not relate solely to housing, and the Policy identifies heritage and biodiversity improvements that will be required as part of any residential scheme. These designations and assets relate as much to the land within the ‘indicative key housing site’ as to outside of it, although mitigation and compensation measures on the remaining land not affected by development is accepted by the Policy allocation as a likely appropriate approach, subject to supportive ecological and heritage surveys, in accordance with the policies of the Local Plan and other legislative requirements. The intention of this section of the Conservation Area Statement is to provide an overview of key Local Plan policies as a reference point, and it would not be appropriate to restate the Local Plan Policy verbatim. Clearly, to refer only to the housing element of the Policy would be misleading, and the proposed text amendment is not accepted.</p> <p>As stated previously, it is considered entirely appropriate to refer to the presence of the SNCI within the Conservation Area Statement (REF3, REF9) of this Consultation Statement). Therefore, the proposed text deletion is not accepted.</p>			
<p>Worth Conservation Area Statement Amended Wording</p> <p>For clarity, text has been amended to clarify the respondent’s point relating to the site size as follows: A parcel of Land within the southern part of the Conservation Area, measuring around 1.8 hectares and referred to as Land East of Balcombe Road/Street Hill, is allocated in the Crawley Borough Local Plan as a Housing, Biodiversity and Heritage site. The allocation site includes part of the designated Historic Park & Garden and the designated SNCI.</p>			
31	The Local Plan provides detail of the key policy issues that	There is an absence of recognition in the Statement that the Inspector recognised that the development would cause some harm to, for	The Local Plan provides detail of the key policy issues that development at

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	<p>development at this location should carefully consider, particularly relating to the important heritage and environmental constraints associated with the site. This Conservation Area Statement provides the clear context, in relation to the heritage assets and key features of the Worth Conservation Area, which will need to be taken into account, and preserved or enhanced accordingly, as part of any planning application for the site. As such, the Worth Conservation Area Statement is a material consideration that will be taken into account when the council determines planning proposals for the area.</p>	<p>example, grasslands, the locally designated Historic Park & Garden etc. but considered that this was outweighed by the need for housing and the associated heritage and environmental benefits which would accrue as a result of this development.</p> <p>It should be noted that the Inspector and consequently the adopted Local Plan does not expect some heritage assets and key features within the housing allocation to be preserved:</p> <ul style="list-style-type: none"> - the grassland meadow (which it is accepted is already diminished and will be lost within the housing area and mitigated through restoration of the remainder of the site); and - the historic park and garden (the Inspector notes: 'evidence of whether the site was part of the historic garden associated with the former Rectory is inconclusive. There are no obvious landscape features typical of an historic park or garden on the site today'); <p>It would appear that in this respect this text is seeking to supersede the Local Plan. This Statement cannot in law supersede the Local Plan and should be amended.</p>	<p>this location should carefully consider, particularly relating to the important heritage and environmental constraints associated with the site. This Conservation Area Statement provides the clear context, in relation to the heritage assets and key features of the Worth Conservation Area, which will need to be taken into account, and preserved or enhanced accordingly, as part of any planning application for the site. As such, the Worth Conservation Area Statement is a material consideration that will be taken into account when the council determines planning proposals for the area.</p>
<p>CBC Response (REF20): Disagree. Worth Conservation Area was designated in March 1987 in order to 'preserve and enhance the character of the setting of St. Nicholas' Church', and it is the designated Conservation Area boundary that defines its rural setting. The Conservation Area Statement relates to Worth Conservation Area in its entirety, and the Local Plan Policy H2 allocation does not mean that other Local Plan Policies, such as Local Plan Policy CH13 (Conservation Areas) simply fall away. Therefore, the wording 'preserved or enhanced accordingly' is entirely appropriate, and remains in conformity with the Local Plan. The proposed text deletion is not accepted.</p> <p>In reference to the Land East of Balcombe Road/Street Hill site, whilst acknowledging that the meadowland and grassland habitat has already been diminished and would be, in part, lost through allowing housing development on the site, the Inspector considered that proper management of the remaining two thirds of the SNCI would help to mitigate any loss as part of any residential development on the allocated site, hence the requirements set</p>			

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32	<p>Detailed Development Guidance for Worth Conservation Area Given its rural location and the important heritage and environmental constraints associated with Worth Conservation Area, the scope for development in the Conservation Area is limited. It is possible that smaller-scale proposals may come forward within the Conservation Area, and in addition to the policies above, the following guidance should be taken into account.</p>	<p>In balancing all the factors, the Local Plan Inspector refers to a 'small but nonetheless significant contribution towards meeting Crawley's housing need' and, despite the challenges, allocates a housing site within the Conservation Area for 15 dwellings (maximum).</p> <p>It is not for the brief to attempt to supersede the Local Plan and significantly curtail development opportunities which, on balance, the Inspector has accepted by stating the scope for development in the Conservation Area is limited.</p>	<p>Detailed Development Guidance for Worth Conservation Area Given its rural location and the <i>Despite the important heritage and environmental constraints associated with Worth Conservation Area, there remains some scope for development in the Conservation Area is limited. Policy H2 allocates a housing site within the Conservation Area for a maximum of 15 dwellings. In addition, it is possible that smaller-scale proposals may come forward within the Conservation Area, and in addition to the policies above, the following guidance should be taken into account.</i></p>
	<p>CBC Response (REF21): Disagree. The Conservation Area Statement is consistent with the adopted Local Plan, and clearly cannot supersede it; nor does it attempt to. Part 4 (Guidance for Development) of the Conservation Area Statement, which immediately precedes this paragraph, clearly references allocation of the Housing, Biodiversity and Heritage site through Local Plan Policy H2 and the requirement to produce a Development Brief for the site.</p> <p>Given its countryside location outside the Built Up Area Boundary and its rural character, the scope for development within Worth Conservation Area <u>is</u> limited. At no point is it stated by the Conservation Area Statement that <u>no</u> development can occur within the Conservation Area boundary. Rather, the Conservation Area Statement provides guidance to ensure that any development that does come forward within the Conservation Area is consistent with, and preserves or enhances, its rural character. The <i>New Buildings</i> (page 34) section of the statement also acknowledges that the East of Balcombe Road/Street Hill site is identified by Local Plan Policy H2 as a Housing, Biodiversity and Heritage Site.</p> <p>With regards to Local Plan Policy H2, in his report the Inspector was acutely aware of the limitations posed by the site, and is clear that development will</p>		

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		<p>be required to reflect the character of the Conservation Area: <i>'In the absence of any illustrative layout, I indicated in my preliminary findings that the site is likely to be suitable for about 15 dwellings. The Council proposes this number as a maximum; given the constraints of the site, this limitation is sound. Indeed, the illustrative layout for 21 dwellings provided by the promoter in response to the modifications consultation serves to demonstrate that it will be challenging to achieve the required loose-knit character with as many as 15 dwellings'</i> (paragraph 57). The requirement that development must respect the setting outside the Built-Up Area Boundary and its rural character is reflected in Local Plan Policy H2, and is supported by the Plan when read as a whole. The Conservation Area Statement text is entirely consistent with the Local Plan.</p> <p>It should be stated that the Conservation Area Statement relates to the Conservation Area in its entirety, and not just the Housing, Biodiversity and Heritage Site allocated by Local Plan Policy H2. Given that the allocated Policy H2 is itself subject to a separate Development Brief, it is not appropriate to provide further detail on the allocation within the Conservation Area Statement.</p>	
	<p>New Buildings The key objective of Worth Conservation Area is the retention of the countryside setting of the historic St Nicholas' Church. This setting is complemented by a collection of low density, scattered buildings that remain in-keeping with the rural character of the area. Consequently, the opportunity for development, outside of the identified Local Plan Housing, Biodiversity and Heritage site East of Balcombe Road/Street Hill, is limited.</p>	<p>See previous detailed evidence and comments regarding the key objective and the setting of the church. As this detailed evidence shows, the church clearly no longer has a countryside setting formed as it is by suburban housing development and a motorway.</p> <p>This setting is in part formed by Worth Way which has a generally suburban character with some relatively recent houses, garages and driveways visible as part of the street scene. The building are aligned along Worth Way and, whilst low density, would not be described as scattered buildings.</p> <p>It is important to recognise that the Local Plan Inspector considers this a semi-rural nature of the Conservation Area.</p>	<p>New Buildings The key objective of Worth Conservation Area is the retention of the countryside to preserve and enhance the setting of the historic St Nicholas' Church. This setting is complemented by a collection of low density, scattered buildings that remain in-keeping with the rural character of the area. Consequently, the opportunity for development, outside of the identified Local Plan Housing, Biodiversity and Heritage site East of Balcombe Road/Street Hill, is limited.</p>
<p>CBC Response (REF22): The respondent's point regarding the setting of church has been addressed previously (REF1, REF2, REF3). For reasons previously discussed, Worth Conservation Area is factually a countryside location, and the assertion that it has a 'suburban' character is rejected.</p>			

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Text has been amended to reflect the Inspector's description of 'loose-knit' rather than 'scattered' buildings. Text is also amended to refer to the built form being largely situated to the north of St. Nicholas' Church, grouped along Worth Way.			
<u>Worth Conservation Area Statement Amended Wording</u>			
Text amended as follows:			
This setting is complemented by a collection of low density, scattered <u>loose-knit</u> buildings on large plots, largely grouped along and accessed from Worth Way, that remain in-keeping with the rural character of the area.			
35	<p>Views</p> <p>The Conservation Area is adjacent to the edge of Crawley's built up area and key access points to the open countryside beyond. Views into the Conservation Area and its rural setting are important to the historic setting of the Conservation Area and should be preserved. Development that impinges on these views will not be permitted. Likewise, any new development that can emphasize these views should do so through subtle and appropriate means.</p>	<p>The statement that development that impinges on these views will not be permitted is overly restrictive and seeks to go beyond adopted Local Plan Policy CH8 - Linear Views – which states that development proposals should not result in a direct adverse impact or lead to the erosion of these views.</p> <p>This Statement cannot supersede the Local Plan and should be amended.</p>	<p>Views</p> <p>The Conservation Area is adjacent to the edge of Crawley's built up area and key access points to the open countryside beyond. Views into the Conservation Area and its rural setting are important to the historic setting of the Conservation Area and should be preserved <i>development proposals should not result in a significant adverse impact on these views.</i> Development that impinges on these views will not be permitted. Likewise, any new development that can emphasize these views should do so through subtle and appropriate means.</p>
CBC Response (REF23):			
The Local Plan is clear that Important Views should be protected and/or enhanced and that development proposals should not result in a direct adverse impact or lead to the erosion of these views.			
Local Plan Paragraph 4.45 provides context to Policy CH8 in relation to important, but more localised views: <i>'The designation would not duplicate protection afforded to Listed Buildings or Conservation Areas. Important but more localised views and landmarks, i.e. less than approximately 200m, will be identified, protected and enhanced through Conservation Area, Area of Special Character or Locally Listed Building assessments. A number of the</i>			

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<p><i>important landmarks in the borough are Listed Buildings and some are located within Conservation Areas, including St. Margaret's Church, Ifield; St. Nicholas' Church, Pound Hill; and the Church of St. John the Baptist near High Street, Northgate. These buildings are subject to national regulatory controls which include requirements to protect their settings'.</i></p> <p>For consistency with the Local Plan, the Conservation Area Statement text is amended.</p>			
<p><u>Worth Conservation Area Statement Amended Wording</u></p>			
<p>The text is amended as follows:</p> <p><i>The Conservation Area is adjacent to the edge of Crawley's built up area and key access points to the open countryside beyond. Views into the Conservation Area and its rural setting are important to the historic setting of the Conservation Area and should be <u>protected and/or enhanced</u> preserved. Development proposals should not result in a direct adverse impact or lead to erosion of these views. that impinges on these views will not be permitted. Likewise, a Any new development that can emphasize these views should do so through subtle and appropriate means.</i></p>			
35	<p>Trees</p> <p>Worth Conservation Area is home to a number of mature trees. These are essential to the setting of St Nicholas' Church and, in enclosing the Conservation Area, provide an important distinction between Worth and the urban area. Alongside the hedgerows and open spaces, these make a key contribution to the rural character of Worth Conservation Area.</p>	<p>The Local Plan Inspector refers to the semi-rural nature of the Conservation Area. Parts of Worth Way could be described as suburban with houses (some relatively recent), driveways and garages visible from the public domain.</p>	<p>Trees</p> <p>Worth Conservation Area is home to a number of mature trees. These are essential to the setting of St Nicholas' Church and, in enclosing the Conservation Area, provide an important distinction between Worth and the urban area. Alongside the hedgerows and open spaces, these make a key contribution to the <i>semi-</i> rural character of Worth Conservation Area.</p>
<p>CBC Response (REF24):</p> <p>Disagree. The council has made clear its position that the character of Worth Conservation Area is considered to be rural and this is established through Local Plan Policy H2 and paragraph 6.54. The council has set out detailed comments in relation to this matter at REF1, REF2, REF3 of this Consultation Statement. The age of the built form within the Conservation Area has no bearing on whether its character would be described as 'suburban'.</p>			
36	<p>The designated Historic Park & Garden and the Site of Nature Conservation Importance</p>	<p>This statement must recognise the allocation within Policy H2 for 15 dwellings (maximum) despite these designations.</p>	<p><i>Parts of the designated Historic Park & Garden and the Site of Nature Conservation Importance (SNCI)</i></p>

Page No.	Consultation Draft Text	Objection	Proposed Change to Consultation Draft (Proposed deletion Proposed addition)
	<p>(SNCI) contribute significantly to the rural setting of St Nicholas' Church. Development, where deemed to be appropriate, should avoid any detrimental impact on these areas, taking steps to mitigate its effect on biodiversity, and where possible deliver biodiversity enhancements. Possible approaches to help achieve this are set out in the Conservation Area Management Plan (Part 5).</p>	<p>It is unclear how biodiversity value, especially one not related to historic landscape, relates to the special architectural or historical value of the Area. The SNCI only relates to part of the Conservation Area and should be assessed in relation to the features which contribute to the character of the Conservation Area. In any event, it is simply not possible to avoid any detrimental impact on the SNCI following the Policy H2 housing allocation. The Inspector accepted the loss of grassland on the housing allocation but in mitigation sought enhancements over the remaining undeveloped area:</p> <p>'Consequently there is considerable force to the argument that proper management of the two-thirds of the SNCI not affected by development would enable the decline of the remaining species-rich meadow habitat to be arrested, thereby mitigating the harm caused by the loss of part of the meadow.' Evidence referred to elsewhere shows that not all of the designated SNCI forms part of the setting of the Church.</p> <p>Nor is it possible to avoid any detrimental impact on the locally designated Historic Park & Garden from development following the Policy H2 housing allocation. The Inspector found evidence of whether the site was part of the historic garden associated with the former Rectory inconclusive and cites no obvious landscape features typical of an historic park or garden on the housing site today. Evidence referred to elsewhere shows that not all of the designated Historic Park & Garden forms part of the setting of the Church. The statement seeks to supersede adopted Local Plan Policy H2 which seeks 'no significant harm to the locally designated historic parkland'. This Statement cannot in law supersede the Local Plan.</p> <p>Amendments are required to this Objective to recognise the Inspector's conclusions and the full policy context which forms the background to this Statement.</p> <p>The Local Plan Inspector refers to the semi-rural nature of the Conservation Area. Parts of Worth Way could be described as suburban with houses</p>	<p>contribute significantly to the rural setting of St Nicholas' Church. Appropriate development, where deemed to be appropriate, should avoid any detrimental impact <i>significant harm to the locally designated historic parkland on these areas, taking steps to mitigate its effect on biodiversity, and where possible deliver biodiversity enhancements.</i> Possible approaches to help achieve this are set out in the Conservation Area Management Plan (Part 5).</p>

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		(some relatively recent), driveways and garages visible from the public domain.	

CBC Response (REF25):

The issues raised in this representation are a repetition of points raised previously by the respondent, which have been discussed elsewhere in this Consultation Statement:

- rural character: **REF1, REF2, REF3**;
- Local Plan Policy H2 allocation: **REF4, REF21**;
- role of the SNCI: **REF3, REF9**;
- the Historic Park and Garden designation: **REF3, REF10**; and
- alleged suburban nature of the Worth Way: **REF1, REF3**.

The Conservation Area Statement relates to Worth Conservation Area in its entirety, and the Local Plan Policy H2 allocation does not mean that other Local Plan policies simply fall away.

The open character of the grassland is a key element of the Conservation Area. The full sentence from the Inspector is quoted at **REF9**. In stating that a 'comprehensive and binding' management plan should be secured as part of any development at the Land East of Balcombe Road/Street Hill Policy H2 site, the Inspector identifies a requirement to improve and maintain the remaining SNCI that is not affected by the development. In doing so, the Inspector clearly acknowledges the importance of the SNCI, going so far as to specifically require the enhancement of its habitats that have in recent years been left to decline. This is specifically required by Local Plan Policy H2, and the suggested removal of text relating to the SNCI is rejected.

It is acknowledged that the text included in this section of the draft Worth Conservation Area Statement could more closely reflect the Local Plan text of Policies H2 (Key Housing Sites), CH17 (Historic Parks & Gardens) and ENV2 (Biodiversity) to assist with clarity. The second paragraph of the *Green Landscaping, Hedgerows and Open Space* section is therefore amended.

Worth Conservation Area Statement Amended Wording

The text is amended as follows:

The open character of the designated Site of Nature Conservation Importance (SNCI) and the wooded landscape of the Historic Park & Garden ~~and the Site of Nature Conservation Importance (SNCI)~~ contribute significantly to the rural setting of St Nicholas' Church. Development, ~~where deemed to be appropriate,~~ should reflect, enhance and ensure no significant harm to the locally designated Historic Park & Garden. Further, development should not result in significant harm to the SNCI, ~~avoid any detrimental impact on these areas,~~ taking steps to mitigate its effect on biodiversity, and where possible deliver biodiversity enhancements. Possible approaches to help achieve this are set out in the Conservation Area Management Plan (Part 5).

Page No.	Consultation Draft Text	Objection	Proposed Change to Consultation Draft (Proposed deletion Proposed addition)
	<p>Conservation Area Management Plan</p> <p>Due to the significant amount of private land ownership, the scope to deliver improvements to the Conservation Area is somewhat limited. Notwithstanding this, there may be opportunities to deliver improvements which will enhance the area:</p> <ul style="list-style-type: none"> - Maximising opportunities to enhance the biodiversity of the SNCI. In particular, this should include the maintenance and long-term management of its grassland, which requires heavier grazing and would benefit from alternating between grazing and cutting for hay. The woodland linked to the Land East of Street Hill/Balcombe Road, also requires management, including, the removal of encroaching rhododendron and laurel. Further detail is provided by Local Plan Policy H2 and its supporting text, and in the Land East of Street Hill/Balcombe Road Development Brief. 	<p>Since the Inspector accepted the loss of grassland on the housing allocation but in mitigation sought enhancements over the remaining undeveloped area, it is simply not necessary or feasible to maintain all of the grassland.</p> <p>It is unclear how enhancing the biodiversity of the SNCI, especially features not related to historic landscape, or Gatwick Stream can enhance the special architectural or historical value of the Area. Such an enhancement measure is unreasonable in relation to the statutory purposes of conservation areas.</p> <p>The Inspector accepted that woodland including the removal of encroaching rhododendron and laurel is outside the ownership of the H2 housing allocation and is therefore not linked as stated.</p> <p>The Archaeology South East Study, 2015 uncovered no evidence of a moated orchard. Nor is this part of Policy H2 which simply requires a suitable unbuilt margin around the archaeologically sensitive Moat. It is therefore unreasonable and historically inaccurate to suggest such a proposal in the Statement.</p>	<p>Conservation Area Management Plan</p> <p>Due to the significant amount of private land ownership, the scope to deliver improvements to the Conservation Area is somewhat limited. Notwithstanding this, there may be opportunities to deliver improvements which will enhance the area:</p> <p>-Maximising opportunities to enhance the biodiversity of the SNCI. In particular, this should include the maintenance and long term management of its grassland, which requires heavier grazing and would benefit from alternating between grazing and cutting for hay. The woodland linked to the Land East of Street Hill/Balcombe Road, also requires management, including, the removal of encroaching rhododendron and laurel. Further detail is provided by Local Plan Policy H2 and its supporting text, and in the Land East of Street Hill/Balcombe Road Development Brief.</p> <p>Enhancements to restore the</p>

Page No.	Consultation Draft Text	Objection	Proposed Change to Consultation Draft (Proposed deletion Proposed addition)
	<p>- Enhancements to restore the medieval moat and its setting, potentially including reinstatement or reflection of the historic link between the moat and the woodland plantation associated with the old Rectory and gardens, restoration of the moated orchard, and steps to enhance the role of the moat as a historic landscape feature.</p> <p>- Explore the potential for enhancements to the Gatwick Stream, including its biodiversity corridor.</p>		<p>medieval moat and its setting, potentially including reinstatement or reflection of the historic link between the moat and the woodland plantation associated with the old Rectory and gardens; restoration of the moated orchard, and steps to enhance the role of the moat as a historic landscape feature.</p> <p>— Explore the potential for enhancements to the Gatwick Stream, including its biodiversity corridor.</p>

CBC Response (REF26):

The Conservation Area Management Plan relates to the Conservation Area in its entirety, not solely the Local Plan Policy H2 site, and covers a range of possible improvements that, with landowner support, could be delivered to enhance the Conservation Area.

As discussed previously in this Consultation Statement, at **REF3, REF9**, it is entirely appropriate to consider the SNCI, which forms part of the rural character of the Conservation Area, within the Worth Conservation Area Statement. At no point does the Conservation Area Statement suggest that all grassland should be maintained, as the principle of some grassland being lost is established through the Policy H2 allocation. However, as required by the Inspector, the policy also requires that development at the H2 site must *v.) limit harm to the species-rich meadow grassland which contributes to the Site of Nature Conservation Area Importance; and vii.) be accompanied by a long-term commitment to the ecological enhancement and proper management of the remainder of the SNCI (excluding the ponds and woodland in the centre and north-east in separate ownership) for the benefit of biodiversity.* It is entirely appropriate, and consistent with the NPPF and Local Plan to maximise opportunities to deliver biodiversity improvements, within the remaining areas of SNCI, and indeed across the Conservation Area. The current wording is consistent with the Inspector’s findings and the adopted Local Plan. The suggested text amendments relating to the SNCI are rejected.

Text amended to remove specific reference to Land East of Balcombe Road/Street Hill in relation to rhododendron and laurel. Text now refers to

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	woodland in the Conservation Area as a whole.	As outlined by the respondent, reinstatement of a moated orchard is not a requirement stated in Local Plan Policy H2. Reinstatement of the orchard moat is however set out as a recommendation in the Report of the History of Crawley Parks, prepared by Sussex Gardens Trust in 2013, and is therefore identified as a possible enhancement to the moat that <u>could</u> be delivered. In respect of possible enhancements to the Gatwick Stream, which are identified as an opportunity rather than a requirement, this has been included in the Conservation Area Statement upon the advice of the Environment Agency. Therefore, the suggested text amendment is not accepted.	
	<p><u>Worth Conservation Area Statement Amended Wording</u></p> <p>The text is amended as follows:</p> <ul style="list-style-type: none"> - Maximising opportunities to enhance the biodiversity of the SNCI. In particular, this should include the maintenance and long-term management of its grassland, which requires heavier grazing and would benefit from alternating between grazing and cutting for hay. The woodland linked to the Land East of Street Hill/Balcombe Road, also requires management, including, the removal of encroaching rhododendron and laurel. Further detail is provided by Local Plan Policy H2 and its supporting text and in the Land East of Balcombe Road/Street Hill Development Brief. 		

WORTH CONSERVATION AREA STATEMENT: ADDITIONAL AMENDMENTS SUGGESTED BY CRAWLEY BOROUGH COUNCIL

PAGE	ISSUE	AMENDMENT
9	Amended text to clarify rural setting of Conservation Area. Additional text added to make clear the reasons for the Conservation Area being designated in March 1987.	Deletion of 'largely' from first paragraph. Additional text added to last paragraph: <i><u>'The boundaries of the Conservation Area were drawn specifically to protect this rural character'</u></i> .
18-19	Additional text added for clarity.	Additional text: Although the wider Conservation Area is enclosed by modern urban settlement
19	Text amended for consistency with Introduction (page 10) and Trees (page 35).	Text amended: <i><u>There is a clear visual transition distinction between from the urban settlement to the west and the rural countryside to the east</u></i>
19	Text amended to make clear that it is the site of the ancient moat being referred to.	Additional text: <i><u>The rural setting also provides context to other heritage assets, including local archaeologically sensitive areas, such as the site of the moated medieval building</u></i>
21	Text amended to clarify the contribution of the rural SNCI landscape to the countryside setting of St. Nicholas' Church.	Amended text: <i><u>Like the wider Conservation Area landscape, it is rural in nature, and contributing to the countryside setting of the church. The SNCI encompasses several habitats in a relatively small area...</u></i>
35	Addition of 'Valued' to section heading for consistency with other Conservation Area Statements. Opening sentence of paragraph is repeated.	Addition of 'Valued' to section heading. Deletion of repeated sentence.
36	Trees. Partial repetition of paragraph within the Trees section.	Delete repeated wording: <i><u>Where trees are threatened by works which would be harmful to the character and appearance of the surrounding environment, the Local Planning Authority will consider serving a Tree Preservation Order to provide further protection. A number of trees in the</u></i>
38	Text added to the Conservation Area Management Plan to flag issue regarding trees at churchyard.	Additional text: <i><u>The council is aware that the row of trees known as the 'twelve apostles' in the churchyard of St. Nicholas' are, as a result of root and trunk growth, obscuring access to the path for church users, particularly</u></i>

		<p><u>for people with mobility issues and also pallbearers during funerals.</u></p> <p><u>The Crawley Borough Council Arboriculture Officer has advised that the trees are near the end of their natural life, and it is possible that the trees may need to be felled in the near future. Given the important heritage contribution made by the tree-lined avenue, particularly in shaping the secluded rural character of the churchyard, should the trees need to be felled, the tree-lined avenue should be reinstated through replacement tree planting of a suitable species.</u></p>
38-39	Amendments to improve clarity of Conservation Area Management Plan	<ul style="list-style-type: none"> - Sub-division of second bullet point to individually consider issues of biodiversity enhancement and woodland management. - Additional text in relation to management of the fish ponds regarding removal of overgrown vegetation. - Relocation of final sentence from second bullet point and additional text to clarify position in relation to Local Plan Policy H2 Housing, Biodiversity and Heritage site.