

design in Manor Royal. The SPD will be used when new

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

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

3.7 Regular emails were sent to all resp0815(e)1.65193(r)-3148(o)12.5228(f)-4.609418(r8(o)1.65326(r

APPENDIX A

First stage of consultation for combined SPD & Public Realm Strategy

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

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

Barton Wilmore (SEGRO)

must be to promote occupation and growth at these sites. As such, some flexibility should be acknowledged in the text.

that developers can be clear of the council's key considerations for the site, whilst remaining flexible over land uses. The revised SPD, amended in light of these comments,

Landscape

Section 2.3 includes a Landscape Structure Plan, which highlights the primary and secondary road tree structures and supporting colour strategy. This level of detail is far too prescriptive, and while the Council may suggest such a scheme as part of a non-statutory document, inclusion in the SPD is inappropriate. The policy could only apply to redevelopment proposals and not in relation to any temporary facilities prior to redevelopment.

Car Parking

Section 2.4 of the SPD sets out that substantial landscape schemes should be provided aimed at reducing the visual intrusion of large areas of on-plot parking, setting out a number of factors that should be considered in development. It is not considered appropriate to require that such extensive landscaping is incorporated within car parking schemes, and schemes should be dealt with on a case by case basis. Therefore, use of the wording "should be considered" is appropriate provided that the Council do not later interpret this as a "fixed requirement". Principles should only apply to

Barton Wilmore (SEGRO)

redevelopment proposals and not in relation to any temporary facilities prior to redevelopment.

Advertising and Signage

Section 2.5 sets out that signage should not contribute to visual clutter. It is important that this principle is balanced with the practical operation of businesses at Manor Royal and does not prevent businesses from being sufficiently sign-posted.

Boundaries

Section 2.6, and in particular paragraph 2.6.3 requires all new developments on key frontages to use where appropriate an indigenous hedgerow, with no security style fencing permitted at the back of public pavements. This wording is too prescriptive, and goes beyond the scope of a SPD, potentially deterring future occupiers. It should be revised to state that security style fencing should be designed carefully where appropriate and should have

Barton Wilmore (SEGRO)

Cycleways and Provision for Cyclists

The objective in Section 2.9 to extend the existing network to improve permeability and increase options for sustainable travel is supported, provided that this is in dialogue with existing businesses to ensure that what is proposed is in line with occupier needs and does not encroach onto development sites.

Noted. The provision of cycle lanes is shown on the cycle network map within the public realm but would require development to consider improving any access or promotion of

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Development Principle Statement Sites

Section 3.4 of the SPD sets out design principles in relation to site D4 SEGRO West, London Road, and repeats the specific design principles as set out in the SEGRO West Design Principles Statement (2012). SEGRO is concerned that identified landscaping requirements could be overly prescriptive in the absence of detailed design, and could place an undue restriction on the developer, potentially hindering development. Of more concern, is the fact that such a depth of landscaping of 10 metres will reduce site coverage. This could affect the commercial viability of the site and could render the site unviable to developers.

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Barton Wilmore (SEGRO)

this level of detail in relation to the design of the primary road network and the public realm goes beyond scope of SPD. We strongly suggest that guidance should avoid being too prescriptive, and that the tone and wording is changed to be explicit that these elements will be sought where appropriate and viable. SEGRO support the proposals for Fleming Way and London Road in Section 5.4 and 5.5. However, it is not clear how the proposed improvements and long term maintenance will be funded and if the cost would fall to developers/occupiers or as suggested in Section 8, a range of funding opportunities.

Delivery

Support Section 8.2.2, which sets out that in addition to Council allocated funding, other funding opportunities for the delivery of the other public realm works could come from development and other channels, as clearly it would be onerous for developers to fund the delivery of all public realm works.

Conclusion

As demonstrated by the Thales scheme on London Road, which is recognised as a successful scheme within the emerging SPD, SEGRO is committed to good quality design. SEGRO supports the role of the SPD in encouraging good design, but would urge the Council to remove the prescriptive design considerations from the document and instead seek to provide guidance on design themes, and emphasise the importance of viability in delivering schemes. In general the policy requirements and supporting text are unnecessarily prescriptive. As set out under Paragraph 21 of the NPPF (2012) investment in business should not be over-burdened by the combined requirements of planning policy expectations. In its current state the SPD is not considered to be in line with Paragraphs 21 or 173 of the NPPF. SEGRO would urge CBC to think more flexibly about design principles across Manor Royal, so that opportunities for development which are supported by market demand are delivered. The alternative is to see

Environment Agency

Biodiversity

There is no baseline ecological appraisal of the retained areas of greenspace in the development included in the document. A more detailed assessment would help to guide policy and guidelines to ensure that the integrity of the ecological network and green corridors are enhanced by outline proposals

- Restoring more natural morphology and character to the watercourse where this has been lost, such as through restoring bed material, natural

Environment Agency

<p>Environment Agency</p>	<p><u>Groundwater Protection</u></p> <p>There is a lot of emphasis on making car parks more visually appealing by encouraging the use of swales and other SuDS methods. It should be noted that all of Manor Royal sits on Weald Clay, which does not allow for much infiltration, and alternative methods may have to be considered. Surface water drainage for the buildings themselves should be included in any design statements. It should be noted that infiltration is not permitted into land impacted by contamination.</p> <p><u>Green roofs and Water Efficiency</u></p> <p>We note and support the approach for encouraging green roofs and walls within design, these can help contribute towards not only extending wildlife corridors but also aid with reducing surface water runoff. There does not appear to be any mention of water efficiency measures to be designed into buildings. As you are aware water is a precious resource and the south east is water stressed. Therefore we would strongly advise the inclusion of water efficiency devices/schemes within this SPD to help reduce the amount of water used unnecessarily.</p>	<p>Noted. This SPD will sit alongside emerging local plan policies and existing SPGs. The council is also intending to develop an additional SPD relating to sustainable development.</p> <p>Noted. Wording added to the new SPD.</p>
<p>Gatwick Airport Limited</p>	<p>We are pleased to see that aerodrome safeguarded has been included in the document.</p> <p><u>New Developments & Alterations 2.2.3</u></p> <p>We would ask that under the first paragraph relating to building heights and safeguarding requirements of Gatwick Airport, that height restrictions for cranes and other construction equipment is also mentioned. Cranes would also need a permit from the airport. Further details can be found in AOA Advice Note 4 'Cranes &</p>	

Gatwick Airport Limited

Gatwick Airport Limited

Please note that some of the areas included in the supplementary document are located within the future airport boundary as shown on Crawley Borough Councils 'Local Development Framework Proposals Map' as 'Gatwick Safeguarding (Core Strategy G2). The general areas are:

- Land North of Cobham Way and East of Gatwick Road
- Land off Beehive Ring Road
- County Oak Cottage/Amberley Court, Whitworth Road
- Land South and West of James Watt Way

GAL will object to any 'non minor' developments proposed within the 'Gatwick Safeguarding Area'.

Renewable Energy

Although there is no specific mention of renewable energy at present in the document, we feel it is worth mentioning that wind turbines can cause potential issues with radar and if any turbines were proposed, early consultation with the airport is recommended to enable us to assess any potential issues. Further advice can be found in AOA advice note 7 'Wind Turbines & Aviation' available at www.aoa.org.uk/policysafeguarding.htm. Large areas of photo voltaic panels have the potential to distort radar and should large areas be proposed, early consultation with the airport is recommended.

and HDC will be pleased to work closely with CBC to support this.

HDC are pleased to note the proposals to improve highways signage and wayfinding from the A23. It is important to raise t

Horsham District Council

Jones Lang LaSalle (on behalf of Thales)

the site for years to come, potentially hampering its ability to make future investments into its business, including at Manor Royal. Therefore, any policy framework for the site needs to be flexible, and whilst it can aim to promote high quality development, it must allow for a range of employment and/or complementary uses on the site.

Evidence has previously been submitted in relation to issues that Thales needs the council's help to overcome, though this does not appear to have been considered. These expressed particular concern regarding the potential allocation of the site for business use alone, which is seen as overly prescriptive and inflexible; expressed concern regarding undue weight being applied to the Manor Royal Masterplan; outlined concern regarding a requirement that the site fund recreational improvements at Crawters Brook; design concern regarding the requirement for a 'landmark building', and regarding proposals for 10-20 metre landscape buffer zones.

Prescriptive policy guidance allocating the site for business use (I9126(s)-6.0241(o69(o)1.78252(r)2(t)-4.348958252(c)-14e)1.7825

Jones Lang LaSalle (on behalf of Thales)

The council states that if it owned more land at Manor Royal then its design aspirations could be implemented. More information regarding the funding available would be helpful to existing landowners/occupiers at Manor Royal so they can help the council ensure it is spent where it is most needed.

Paragraph 1.5.1 states that the NPPF requires Local Authorities to assist in building a strong, competitive economy, and should not over burden investors with policy expectations. There is concern that both the Manor Royal SPD and Design Principles Statement are overly prescriptive in providing a raft of policy and design guidance that place restrictions in terms on the type size, location, and form of any develop

Jones Lang LaSalle (on behalf of Thales)

The design guidance provided at 7.3 in relation to Crawter's Brook is very prescriptive and further information in relation to the feasibility of the council's funding allocation to show how any of the improvements would be paid for would be welcomed. If it is solely the responsibili

Rapleys LLP

“it is not the intention of the SPD to be overly restricting any uses classes spatially, beyond policy EC6 requirements that limit retail and residential uses”. We do not object to the reference to Policy EC6, if it solely relates to the “character areas” as defined as Character Areas A, B and C on the Character Area Plan. The sentence should be clarified such that that the
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<p>Thales</p> <p>Thales</p>	<p>Thales is disappointed that many previous representations appear to have ignored and is disappointed not to have been given more time to respond to this current draft. Nor has Thales been contacted to discuss any of its concerns in greater detail. Thales therefore reserves its position in regard to the draft SPD in all respects and requests guidance on routes of objection and/or appeal.</p> <p>Crawters Brook is an area of particular concern, and it seems unfair that simply because of the Thales building location that future developers may be expected to contribute to the improvement of Crawters Brook. This is particularly the case given that the hoped for improvements would be aimed at benefiting the estate as a whole.</p> <p>The draft SPD refers to investment being made by the local authority. With this in mind, please could you provide the following information:</p>	<p>Direct contact with Thales and its planning agents has been undertaken, and liaison has been undertaken to clarify Thales' preferred contacts for the revised SPD.</p> <p>Officers have checked the database accordingly and notification had been sent direct to contacts at both Thales and Jones Lang LaSalle as its planning agent. However, following the completion of consultation detailed discussions have been on-going to rectify the situation and full opportunity has now been afforded to both parties to participate in both stages of consultation.</p> <p>The SPD will reflect and update guidance set out within the DPS as approved by the council in 2011. However, further consideration of Thales' representations has been given as part of the revision process.</p> <p>The SPD will be considered by Cabinet, and Thales and its planning agents have the opportunity to make further representations and are able to speak directly at the meeting.</p> <p>By separating the SPD Design Guide from the Public Realm Strategy, it is anticipated that it will be clearer that the potential improvements to Crawters Brook are not expected to be funded by the landowners or developers on the adjacent site. However, currently public realm S106 payments may be utilised to initiate any improvements. These are currently applied to any development regardless of its location</p>
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To what extent might this be available? Thales believes that the proposals on boundaries are unworkable and far too restrictive on many types of use.

Thales

Generally on lighting, it seems contrary to the current economic climate that the council is promoting prominent lighting. Notwithstanding the environmental impact, does the council intend to make a contribution to energy costs?

Specific Proposals for Site D2

These are extremely restrictive suggestions and serve to make development of the site unviable. They also appear to seek to reduce the usable areas of the site significantly with much land lost to aesthetics, access, and landscaping. Significant contributions from the council would appear to be necessary to compensate the landowner/developer for these restrictions.

Access routes from Crawters Brook and the proposed viewing platform would significantly reduce the security of the site. How would this be funded?

The council's development aspirations are unrealistic – there is no demand for this type of development and if published the SPD would condemn the site to laying barren for many years to come. This would not deliver any form of gateway development and have quite the contrary impact on the image of the estate to that hoped for. Furthermore, the development of Crawters Brook would be unattractive to developers if this brought an additional cost burden to any scheme, without appropriate support funding from the Council. Thales is greatly concerned that our site would be massively impacted by these proposals, more so than any other site by a range of aspirations (i.e. that the area could be used for other purposes).

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Boundaries

In respect of Crawters Brook, the diagram in 7.3 refers to potential for links with adjoining development – this has not previously been discussed with Thales, could the comment please be explained? Thales has no intention of agreeing any such access, or any other form of access along its boundaries.

A number of vehicular, pedestrian and cycle routes are referred to in the document, which appear as though they may impact on the Thales site if delivered. Similarly, the diagram in section 1.7 suggests significant encroachment onto the Thales site by road or leisu

(County Oak Business Centre). Consent at Premier House was subject to an extension of time through CR/2011/0022/FUL.

The Manor Royal/Betts Way DPS is now out of date following publication of the NPPF, and we are very concerned that detail contained in this document has been incorporated into the design guidance SPD. We acknowledge that Paragraph 1.5.1 of the draft SPD makes reference to the NPPF, but disagree that the Regeneris Work (2008), Masterplan (2010), and Development Principles Statements (2012) reflect the NPPF approach. It is considered therefore that the wording of paragraph 1.5.5 should be amended to state 'any Development Principles Statements where there is no conflict with the NPPF'. It is considered that the wording of DPS paragraphs 4.7-4.9 is overly restrictive and does not reflect the NPPF. A degree of flexibility should be incorporated into the SPD in line with the NPPF to reflect economic circumstances at the time. Too many restrictions regarding land use hinders economic growth.

The land owned by my client is identified as part as part of Development Site D5 and Gateway 3. The Design Principles Plan on page 29 shows the siting of a 'landmark building', to which my client has no objection and agrees that the site is properly identified as a gateway to Crawley. However, my client would like to strongly object to the wording in paragraph 3.4.1, which states *'it is important that high quality improvements are consistently delivered, regardless of the land use concerned, as each development opportunity comes forward'*. It is considered that this wording potentially restricts the development potential and commercial viability of my client's site, which has previously been granted planning permission without any such restrictions. It is considered that to hamper the development potential of the site would be contrary to NPPF paragraph 21, over-burdening investment in business.

WS Planning & Architecture
(on behalf of Windsor
Fairlawn Ltd)

Further, the wording of criterion 5 of paragraph 3.4.2 (frontages) is not considered to be acceptable. My client has extant (unimplemented) planning permission for development, and should it become necessary to re-apply for

the NPPF. The SPD no longer provides guidance that restricts the land use types that are considered appropriate, an approach that is in line with the NPPF and adopted and emerging local plan policy.

...requirements
of the site, which in

APPENDIX B

Second stage of consultation for combined SPD & Public Realm Strategy

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

Three representations were received

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

Press releases and notices were put in the local paper

Weblinks and web updates were on the council website

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

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

Gatwick Airport Safeguarding

We are really pleased to see that Aerodrome Safeguarding now has its own section being 2.9 'Gatwick Specific Issues'. We would like to make the following comments:

Para Two – AOA/CAA

The AOA documents are guidance notes however the CAA publications are legislation. Would it be possible to change the wording to the following;

'There are a number of guidance documents available

	General Comments	Noted. Text to be added
	AOA Website – Please note that the AOA website address has now changed to www.aoa.org.uk/operations-safety/ At the end of the first sentence (GAL) should be added after 'Gatwick Airport'.	
Highways Agency	No comments to make	Noted.
Network Rail	No comments	Noted

Barton Wilmore, on behalf of
Segro

should seek to meet these design requirements, but not as a definitive development standard.

Section 2.1 Buildings: SEGRO supports the intention under the development proposals requirements set out in 2.1 'Buildings', to seek higher buildings at or adjacent to gateways where a stronger built form is required to provide identity and a sense of arrival, so long as this does not stifle development opportunities at gateway sites such as SEGRO West. SEGRO's intention for SEGRO West is to bring forward a high quality development, with design considered on an individual basis and the specifics of design detail dealt with at planning application stage, not prescribed by planning policy.

Section 2.1 'Buildings', also states that proposals should seek to provide active frontages to routes within or adjacent to the site. It is suggested that this

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Barton Wilmore, on behalf of Segro

Green Space' sets out requirements for providing green space for employee enjoyment and recreational facilities. It is important that it is made clear that this will be required where viable, without impacting on deliverability. In addition, it should only be a consideration on a site by site basis as it may not be appropriate or possible to deliver such amenity on certain sites.

Section 2.4 Parking and Servicing: Section 2.4 'Parking and Servicing' requires that any significant on-plot provision should be sited away from public frontages and behind the building. We suggest that a caveat is added to clarify that these design principles will be required where viable and deliverable, to ensure that developers are not bound to unviable or undeliverable requirements that could hinder the deliverability of development. In addition, this policy needs to be applied practically on a site by site basis, taking account of site characteristics such as access and building layout.

Section 2.5 Advertisements and Signage: Section 2.5 'Advertisements and Signage' requires Design and Access Statements to evidence a considered approach to signage and make reference to neighbouring development and views from public areas. It is important that this principle is balanced with the practical operation of businesses at Manor Royal and does not prevent businesses from being suffmootrtanennt s a(R)-0.89126(o)-10.2657((R)-0.89126(o)-10.265.1569(

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Barton Wilmore, on behalf of Segro

character area, where development proposals should demonstrate how they maintain the spacious setting of buildings, build on the impact of high quality public realm, provide active frontages and explore the potential for taller buildings. These general principles are supported, provided they are applied appropriately to proposals, balanced with developer aspirations.

On Figure 8, a gateway/landmark building is indicated at the junction of Fleming Way and London Road. Although the Council's aspiration for high quality development on this site is supported there is concern that the term 'landmark building' is not clearly defined, particularly the exact location. A development that has to hug the roundabout corner creates layout and circulation difficulties. This could serve to stifle development if it remains this prescriptive.

The section sets out design principles for Gateway sites. It should be clarified that whilst the SPD seeks high design standards at key Gateway sites and frontages, this should not undermine or result in potential land uses being rejected on the basis that they cannot deliver for example land-mark office buildings, and that such sites, provided they are for an economic development activity, will be supported provided the overall design standard is appropriate. In order to maintain a flexible approach we strongly suggest that the wording in the SPD is revised to emphasise that proposals should seek to meet these design requirements, but not as a definitive development standard.

Barton Wilmore, on behalf of Segro

Section 4 Key Development Sites: In Section 4.3.3 'Key Development Sites' SEGRO West (D4) is identified as a key opportunity site, offering an opportunity to create a gateway development of high quality design. SEGRO supports the aspiration for high quality design, as demonstrated by the Thales scheme. However, this section states that at SEGRO West a master-planned approach is sought. SEGRO considers that this requirement is potentially onerous and time-consuming, and not necessary in order to implement high quality design at SEGRO West. Indeed it could slow down development at the site,

Barton Wilmore, on behalf of Segro

and contrary to Paragraph 21 of the NPPF (2012) which states that investment in business should not be over-burdened by the combined requirements of planning policy expectations.

Figure 11 identifies a landmark building at the junction of Fleming Way and London Road. As set out above, it should be noted that a development that has to hug the roundabout corner creates layout and circulation difficulties. This could stifle development if it remains this prescriptive.

Noted. See above. There is no def(r)-4.34747(e)1.

Section 4.3.3 sets out that the roundabout provides a good opportunity for public art, high quality landscape and signage, and that proposals should create legible routes for pedestrians, cyclists and vehicles. Although this approach is supported as it builds legibility and permeability at Manor Royal, it is important that the viability and practicality impacts of any such proposals are carefully considered.

Under 'Site Frontages' in section 4.3.3, it is advised that the SPD does not set rigid guidelines regarding the height of new buildings but does emphasise the need for high quality design, including urban design. The SPD highlights the importance of appropriate scale responses to the identified gateways. The Council will also carefully consider whether schemes for low buildings would provide an adequate degree of enclosure to important frontages, such as London Road. SEGRO supports this more flexible approach.

Manor Royal Public Realm Strategy

Section 1 of the Public Realm Strategy provides a summary of strengths, weaknesses and opportunities at Manor Royal. Although this section clearly recognizes some of the key challenges at Manor Royal in terms of vacant buildings, it is imperative that it does not then go on to seek

<p>Barton Wilmore, on behalf of Segro</p>	<p>restrictive design principles as a solution, which could in fact stifle development and worsen the situation.</p> <p>The Public Realm Strategy sets out six objectives for Manor Royal. These six objectives set out the principle aims of the Public Realm Strategy in establishing clear design guidance that will result in a quality image and environment for Manor Royal. Whilst this is supported in principle, it is considered that some of the objectives insofar as they relate to the creation of high quality buildings and public realm with a consistent design approach are likely to have a contrary effect on growth, and it is important that viability and deliverability are recognised as a key objective for Manor Royal. Indeed, paragraph 6 of section 1 highlights Paragraph 21 of the NPPF (2012) which emphasises the need for Local Planning Authorities to assist in building a strong and competitive economy and that planning should not over burden investors and businesses with policy expectations, but should look to address potential barriers to investment and in 1.5 there is a commitment to supporting economic growth. If the Public Realm Strategy is to meet this aim it is essential that a balance is struck between design principles and economic growth at Manor Royal.</p> <p>Section 2 – Gateway 3 London Road/Fleming Way: Gateway 3 London Road/Fleming Way is identified as one of the proposals to deliver Objective 1: To strengthen the identity of the whole of Manor Royal through the guiding principles of environmental improvement and landscape hierarchies of the gateways and roads. It is considered that the requirements set out are inappropriately prescriptive, and could impact on occupier requirements and potentially hinder development opportunities. In addition, it is important for the Public Realm Strategy to emphasise that landscaping schemes should not impact on scheme viability and deliverability.</p> <p>Section 2 – Proposal 3 Public Realm Improvements to SEGRO West London Road (D4): Proposal 3 SEGRO West is identified as a proposal in working towards Objective 2: encourage quality landmark developments at the key gateways and opportunity sites. Emphasis is</p>	<p>Noted.</p> <p>Noted.</p> <p>The role of the gateways is to strengthen and improve the entrance/exit of manor Royal and facilitate an uplift with regard to design and function. The public realm elements are illustrative and will assist in improving areas of</p>
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development in order to tackle development stasis at Manor Royal.

Conclusion

	<p>given sufficient weight in the decision making process in the context of the current economic climate. SEGRO supports such an approach and urges CBC to be realistic in its expectations of development and what development can achieve and afford. The approach CBC takes to town planning decisions and the strategy for spatial development across the administrative area should be cognisant of this economically difficult context.</p> <p>SEGRO would urge CBC to think more flexibly about design principles across Manor Royal so that opportunities for development which are supported by market demand are delivered. The alternative is to see sites remain under-utilised and vacant for an indefinite period. As demonstrated by the Thales scheme on London Road, which is recognised as a successful scheme within the emerging SPD, it is clear that SEGRO is committed to good quality design. The comments immediately above in this conclusion section apply to all the SPD policies and Public Realm Strategy Guidance.</p>	<p>backs etc following previous representations and now considers a more pragmatic and flexible approach, whilst encouraging early discussions regarding case by case circumstances.</p> <p>Noted. See comments above</p>
<p>WS Planning & Architecture on behalf of landowners at Betts Way</p>	<p>Further to the subsequent consultation, we have reviewed the responses by other stakeholders and the council replies to them and ourselves. We feel that although the idea of a separate Manor Royal SPD and Public Realm Strategy might appear less prescriptive and restrictive we feel that in actual fact it has not moved far enough in recognising the issues raised. We would like to reinforce our earlier comments set out in my previous letter dated 12 February 2013 and endorse those of other stakeholder representatives.</p>	<p>See Appendix A for detailed responses</p>
<p>Tinsley Lane Association</p>	<p>The TLRA strongly supports the proposed SPD and PR Strategy for Manor Royal but wishes to make the following comments:</p> <p><u>Re: Paragraph 2.4</u></p> <p>The provision of adequate car parking is a necessity even while the use of public transport is being encouraged. Where space is limited the provision of underground car parks could be encouraged.</p> <p><u>Northern Industrial Zone</u></p>	<p>Noted</p> <p>Undercroft car parking can be a design solution but can also be costly and prescribing</p>

The Consultation Process

In terms of the consultation process it should be noted that the draft SPD and Public Realm Strategy were initially issued at 4.30 PM on 30th April 2013 and the end of the consultation period is 13 May.

Taking into account bank holidays this left only eight working days to

		subsequent telephone calls with the planning agents. CBC will continue to work closely with Thales on any development proposals as they do with all land owners.
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The Need for the SPD and/or the Public Realm Strategy

Even with the changes made to the document and the separation of the guidance into a Design Guidance and Public Realm Strategy Thales is concerned that these documents still provide an ove

Thales' concern is that the Council's approach will still blight the site for years to come, undermine the financial case on which it based its decision to invest in Manor Royal, and could potent

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

The designation of the site within a Core Business Zone and as a Gateway Site

The document continues to set out the general designation of the site within a 'Core Business Zone' (Figure 7/Section 4.1) and its identification as a 'Gateway' site. This is contrary to the representations previously submitted, and all previously made representations are hereby re-stated and not reduced, removed or superseded by this submission and should be considered in conjunction with this submission. Therefore Thales' objection still stands and should be taken into consideration before the SPD is presented to Members.

It is understood from discussions with Offices that the reference to a 'Core Business Zone' is simply in order to encourage high quality business like design of the buildings within it. However, in terms of the Gatwick Road site, it is unlikely that it will be able to come forward for

Key Development Sites 4.3.2 Thales Gatwick Road (D2)

It is acknowledged (and welcomed) that the overly prescriptive policy wording, which provided site specific land use guidance, allocating the site for business use, has been removed to ensure that the wording generally respects the guidance within the NPPF (other than for the wider designation of the 'Core Business Zone' as detailed above).

The changes made to the document (in line with Thales' previous representations) removing the reference to specific building heights / the

accommodated in this location - no evidence has been provided to understand where the Council has canvassed agents / developers /occupiers views as to the best location or configuration of the building to ensure that it can be used for a range of uses, to ensure the site is not blighted from coming forward; and

No specific location is proposed.

4. **The policy framework is still overly prescriptive** i.e. if Thales or another party was to submit a scheme for the building in another location (because it was commercially viable to do so) it would be contrary to the guidance within SPD and therefore the site could be prevented from coming forward for development (contrary to the national guidance contained within the NPPF).

No location is prescribed, other than the need

The site is constrained due to its relatively small size and triangular shape; if and when a particular use is proposed it will require careful consideration of the location of the building to understand how to make the best possible use of the site. This is in order to maximise the amount of commercial development which can be accommodated on it (to help provide new jobs in the borough), along with ensuring that a sensible and commercially viable car parking / landscaping scheme can be accommodated.

If the Council provides specific guidance in relation to the location of the building/the buildings frontage and denote a unspecified 'set back' strip of land (without any firm architectural or commercial advice) it will significantly reduce the developable area of this already constrained site and potentially sterilise the site and prevent it from coming forward for development.

This is because in this difficult economic market (and indeed at any time) the location / size and shape of any commercial building is key to both maximising the level of development which can be accommodated on the site and whether or not it is commercially viable.

Therefore, as set out above, the Layout Plan including the 'set back' strip

should not be included within the SPD.

across the Manor Royal environment, and provision of an appropriate level of landscaping is viewed as an important means of addressing a generally poor relationship between the private and public realms. The council would therefore wish to ensure that opportunities are fully explored through site layout and design to comply with the SPD

Other Key Design Issues

Thales has previously made clear its objection to the assumption that it can allow access to Crawters Brook from its site or that a building should be specifically designed to overlook it. This objection still stands.

It should also be noted that the Gatwick Road site was previously a high-security List-X site and therefore none of these proposals can be considered without due regard to the security implications. If it was to revert back to that use it would be impossible to adhere to the Council's guidance on boundary treatment or frontages as it would conflict with the secure nature of the site. Only in the event of a new use coming forward on the site could relaxations be made, but this is not known at the current time.

Furthermore, Thales has no intention of giving up any more of its land or to allow its boundaries to be breached, altered or amended in anyway. This is because the site is already relatively small and constricted the loss of anymore of the developable land is likely to prevent it from coming forward for development.

Furthermore, the **Council's requirement for a 10 metre 'landscaping zone' along the longest frontage of the site (320 meters) at Para 3.1.1, effectively sterilises a large proportion of the site from coming forward for development.**

The SPD will therefore prevent any development from coming

forward on approximately 3,200m² of the Gatwick Road site, not

improves the biodiversity of Crawters Brook as well as the access to it. The landowner of Crawters Brook is the Council. It is unacceptable to expect the cost to be borne by the owner or developer of the Thales site just because it happens to be adjacent to it, therefore has the Council

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

		<p>Public Realm Strategy is very much a complementary one to the formal guidance of the Manor Royal Design Guide SPD. As such, the PRS does not seek to prescribe mandatory proposals, but rather sets out advice and possible methodologies through which the design objectives of the SPD could be delivered. In this regard, proportionate weight would be applied to its content in any planning decision.</p>
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The Main Issues that will prevent the Site from being developed

The reference to the onus on the private sector to provide the improvements to Manor Royal

Paragraph 5 states that The Design Guide SPD and the Public Realm Strategy will build on a consensus process between private and public sectors, and do this by, providing design guidance in the SPD and Public Realm Strategy.

Whilst of course Thales support improvements at Manor Royal generally, it is concerned that prescriptive policy guidance/requirements, contained within the document potentially could prevent development from coming forward on the site rather than encourage vacant units to be occupied or sites to be built upon for new development.

Therefore it must be made clear that the guidance is aspirational only and will not be strictly applied particularly if it will make new development unviable.

The SPD & public realm strategy are proposed to deliver and ensure a high-quality environment across the Manor Royal Business District is delivered. Whilst it is recognised that the current economic climate represents a constraint to development, the SPD seeks to plan positively to attract inward investment. As such, the council will require development to have regard to the guidance of the SPD, but will work closely with developers through the planning process, and will consider individual circumstances on a case by case basis.

Initial cost assessments for the schemes have been undertaken at this stage but additional feasibility will be undertaken when a scheme is ready to be considered. These funding elements are not considered appropriate to be included within the document but have formed part of the assessment process. Funding from developers 02(i)5.1299(s)-6.0241().34747(s)051(

		as currently stand under the adopted S106. Noted
	<p>Reference to Thales Gatwick Road (D2) being a Key Development Site</p> <p>In terms of the detailed guidance contained within Proposal 2, it would be helpful if the supporting text acknowledges some of the constraints facing the redevelopment of the site. That is, the supporting text should be set out in respect to the Council's acknowledgment/ understanding that over the last few years it has been difficult to attract a potential occupier and/or purchaser for the site.</p> <p>On this basis, Thales strongly disagrees with the description of the site and the requirements for its redevelopment in paragraphs 75 to 78.</p>	<p>The site is considered to be gateway and is a key development site by virtue of its prominence on the Gatwick road and the definition of the eastern side of Manor Royal. The site has been defined as a key opportunity since 2010 within the DPS and Masterplan and should remain so.</p> <p>Text is not to be changed in the strategy as this does not highlight any similar constraints for other sites. However the wider economic recession and decline in potential development is addressed across the SPD and Strategy, which recognise the economic issues related to delivery. This has been addressed by removing a number of constraints such as set backs, building heights etc.from the original documents.</p>

As stated above the site is not considered a 'Key' or Gateway site and i0241(u)1.78252(c)-6.02415n(u)1.11g r

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