PART 1

Who was invited to make Representations

T

Lovell White Durrant
Lowfield Farm, Charlwood Road
LSG Skychefs
Maidenbower Baptist Church
Maidenbower Residents Association
Maidenbower Residents Association
Malcolm Judd & Partners
Manor Green College
Manor Green Primary
Manor Royal Business Association
McCarthy & Stone (Assisted Living) Ltd
McCarthy & Stone/The Planning Bureau
McLean Homes South East Limited
Mental Health Sussex, Wealds & Down NHS Trust
Metrobus
Mid Bewbush Community Association
Mid Sussex District Council
Miller Homes
Milton Mount Primary School
Milton Mount Tenants and Lessees Association
Mind in Brighton and Hove
Mitsui Babcock Energy Ltd
Moat
Moat Housing Group
Mole Valley District Council
Monarch Airlines
Montefiore Institute
Morley Fund Management
Mr Andrew Hair, Federation of Sussex Amenity Societies
Mr Brian Holden, West Sussex Fire & Rescue Service
Mr Chris Whitwell, Friends, Families and Travellers
Mr David Edwards, Taylor Wimpey Strategic Land
Mr Farakh Jamal, Crawley Islamic Cultural Centre
Mr Keith Greenleaves, PHNRA
Mr Keith Parsons, Central Crawley Conservation Area Ctte.
Mr Mark Fisher, The Lawn Tennis Association
Mr Matthew Church, Croudace Homes Ltd
Mr Michael Fearn, Shire Consulting
Mr Nicholas Ide, Batcheller Thacker
Mr Pete Crawford, Gatwick Greenspace Crawley
Mr Peter Smith, Cycling Touring Club (CTC)

Momes

Pre School Learning Alliance
Pre School Playgroups Association
Public Art Development Trust
QSR Development Ltd
Ramblers Association
Ramblers Association (North Sussex Group)
Ramree, Forgewood
Rapleys
RDJW Architects
Reigate and Banstead Borough Council
Renaissance London Gatwick Hotel
Rights of Way - Planning Inspectorate
Royal British Legion/Crawley Blind Bowlers
Royal Institute British Architects RIBA
Royal Mail
Royal Mail Group
Royal Mail Property Holdings
RPS
RPS Planning Transport and Environment Ltd
Rusper Parish Council
Rydon Homes Ltd
Sainsbury's Supermarkets Ltd
Sandalwood, Rusper Road
Savills
Savills
Savills Ltd
Scotia Gas Networks
Scottish Widows Investment Partnership
SE England Conservancy (Forestry Commission)
SEEDA (South East England Development Agency)
SEERA
Seymour Primary School
Shared Intelligence
Shelter
Showmens Guild of Great Britain
Siri Guru Singh Saba
Slaugham Parish Council
Sostar Juth Nayee
Sostar Juth Nayee Post Office
South Crawley Baptist Church
South East Arts Board
South East Coast Ambulance Service
South East England Regional Assembly (SEERA)
South East Water
South England Institute of Tamil Culture
Southern Housing Group
Southern Water
Southern Water Services
Southgate Primary School
Sport England
St Alban's Gossops Green
St Andrews Primary School
St Andrews Vicarage (COE)
St Barnabas COE
St John the Baptist C of E Church
St Leonards Church
St Margarets CE First & Middle School
St Margarets Primary School
St Martins Property Corporation Ltd
St Mary Magdalene COE

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

PART 2

Representations & Responses

The Council can Equality Duty, the Council will not accept representations, objections or comments that are deemed to be inappropriate, offence or racist. In general terms, a racist representation is one which includes words, phrases or comments which are likely:

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

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

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

Representation Summary: The statements here are all suitable, but could refer to any town. We would like the original vision for Crawley, as a town within the countryside, to be implemented and maintained. In terms of scenarios, the position CBC is taking (a mix of scenarios 2 and 3) is probably appropriate, as dialogue with other authorities seems essential, p. This

that to meet housing targets and continue the neighbourhood principle, development beyond the town boundary is inevitable. This would remove the vision of a town within countryside. Should the North East Sector fail to come forward, IVCAAC would favour a scenario that acknowledges the limited availability of land at Crawley, and outlines that the South East Plan target cannot be met.

Officer Response: T he approach advocated is no ted. Should the North East Sector remain unavailable the Council will need to consider what other options are available to meet the South East Plan requirements and what, if any, contingency arrangements should be put in place. However, the Council would want to ensure that, whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

Mr Peter Brooks
Respondent Ref: 148858
Telcon Ltd

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

Officer Response: Noted

Miss Claire Tester
Respondent Ref: 149286
Mid Sussex District Council

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

Officer Response: Noted

Mr Nicholas Eyles
Respondent Ref. 149690
Palace Street Group

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

1. Could the documentation not be much shorter and far less repetitive - say each subject limited to 2 sides of A4.

2. Could the conclusions allow much more flexibility in terms of use and delivery to accommodate changing circumstances. Who knows what will be appropriate in 2105 or 2020. The best towns in the UK have matured on a "higgledy piggledy" basis over the last 2000 years rather than being uber planned.

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

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

Representation Summary: I do not accept that CBC should sacrifice green space areas in Crawley for further housing, though if appropriate road infrastructure and services are provided, I see no problem in the continuation of the neighbourhood principle in the peripheral areas beyond the current Crawley boundary to the east and west of Crawley.

of Crawley Technical College is essential, though talk of a university is

In terms of the options outlined, SCC would on balance, SUPPORT

Mrs Eves
Respondent Ref: 152306

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

Officer Response: Noted

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

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

Officer Response: The support for the sub region is noted. The Preferred Strategy will outline the housing requirement. This will have regard to the North East Sector Inquiry decision, the outcome of sub regional studies, the policy direction of neighbouring authorities and consideration of alternative options. The support for the neighbourhood principle is noted.

Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport

Representation Summary: We support the principle identified in topic paper 1 of 'key issues' that the CSR should contain a robust policy for supporting the growth of the airport in its current form as a one runway two terminal airport. We believe it is also necessary for the CSR to include a clear

TOPIC PAPER 2 CLIMATE CHANGE AND SUSTAINABILITY

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

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

base will need to provide a sufficient level of justification for the approach it wishes to take.

Officer Response: Noted and agreed. The Council is preparing an

targets and if so what they should be. This work will inform the Preferred Strategy document.

Miss Katie Gosling
Respon dent Ref: 148072
Environment Agency

Representation Summary:
consider flood risk, which is likely to increase with climate change.

Reference is made to the need for water efficiency to accommodate growth, but no targets for water efficiency are set. The South East is an area of serious water stress, and the lack of targets published in the South East Plan make it even more important that water efficiency targets are included in the LDF. We would like to see all dwellings built to a whole home water standard of 105 litres per person per day, Code for Sustainable Homes level 3/4, as a minimum. Attention should also be paid to waste-water infrastructure to ensure that adequate sewage treatment works and other waste-water infrastructure is provided in a timely manner.

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

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Mr Peter Minshul l
Respondent Ref: 148635
Highways Agency

Representation Summary: HA consider that transport sustainability should be a key part of the sustainability consider(j)PeET EMC /P /MCID 34>BDC BT1 0 0

PART 2:

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

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

Any policy on climate change/ sustainability should be justified and accompanied by succinct draft SPD (at the Proposed Submission stage).

balanced alongside a clear mechanism to allow viability testing.

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

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

Officer Response: Agree with response s. The Council is preparing

targets and if so what they should be. This work will provide a justification to policies and Supplementary Planning guidance to support any new po licies.

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

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

Officer Response: Noted

Mr David Sims
Respondent Ref: 150417
Southern Water Services

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

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

Officer Response: The Council notes the pressure that current development requirements are placing upon water infrastructure and resources within the sub -region. In order to ensure that future development, and in particular strategic development, is planned with water infrastructure in mind, the Council will be working alongside neighbouring authorities, water in frastructure providers, and the Environmentilc4ben i(w)-14(i)1(.)-4(t)6(,)6( )]i(t)-4(g6(l(i)-4(de)cu)15(l)ak)(s

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

Miss Janyis Watson
Respondent Ref: 150755
Sussex Wildlife Trust

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

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

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

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

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

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

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

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

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

Officer Response: The Inspector in the previous Core Strategy Examination made it clear that any sustainability policies must be locally specific and not repeat national guidance / targets. The Council is preparing an evidence base to assess if i

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

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

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

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

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

Officer Response: Support for potential approaches is noted .

evidence base to test technical viability. This will be explored in the preferred strategy.

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

Mrs Eves

Respondent Ref: 152306

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

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

Officer Response: Gre
currently being considered as part of an emerging sustainable

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Mr B Wharton
Respondent Ref: 152314

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

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

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

PART 2:

TOPIC PAPER 3

RPS (on behal f of Sussex Police)

Representation Summary: The Core Strategy Review should include objectives and policies that seek to ensure the design of new development works to reduce crime, fear of crime and anti-social

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

Mrs Eves
Respondent Ref: 152306

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

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

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

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Mr B Wharton
Respondent Ref: 152314

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

Officer Response: A character appraisal of the Borough has been undertaken and the recommendations concerning positive and less positive areas are currently under consideration. The infilling of existing areas, where appropriate, is encouraged by Government policy as a means of limiting the need for development in the countryside and to provide sustainable development that makes best use of existing facilities. The Council is seeking to reinforce existing policies which seek to secure high quality design. To be addressed in the Preferred Strategy

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Mr Tim Hoskinson
Respondent Ref: 1501 85
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

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

Areas which do not work aork s(de)4ohtrvetls s(de)4ohtr721.66 363.91 JEo

Officer Response: Note s upport.

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

Mr Tony Fullwood
Respondent Ref: 146753

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

Support the Borough Council setting out how potential conflicts between heritage or character assets and new development, would be managed.

TOPIC PAPER 4 AIR, NOISE AND FLOODING

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

Representation Summary:
Core Strategy Review to include policies which effectively replicate the approach in PPS23, PPG24 and PPS25. However, it is important that local considerations are taken into account when applying national planning policy to local spatial planning. This is particularly relevant in relation to flood risk, where P
identifying locations for development, through application of the Sequential Test and the Exception Test (*further details provided*).

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

Miss Katie Gosling
Respondent Ref: 148072
Environm ent Agency

Representation Summary: Flood risk is not an issue that can be combined with air quality and noise. We support the use of the SFRA as evidence base, though this must contain up to date information, and currently needs updating. The SFRA provides an overview of the nature and scale of potential flood risk posed to a particular site under consideration, and its findings should be reflected in a locally specific flood risk policy. Gatwick is an example of an area where such a policy could be developed, and we are keen to work alongside CBC and BAA to agree an integrated approach to managing flood risk at the airport.

The Core Strategy Review should also reflect the findings of the Mole Catchment Flood Management Plan and policy units, particularly regarding areas of the Mole susceptible to rapid flooding from thunderstorms. We do not agree that flood risk in Crawley is as mini-80o01(t)-4(l

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

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

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

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

Officer Response: Noted. It is agreed that issues of air quality, nois4( )-25(qu)5(a)13(l)-5 1 0 0 1 350.21 338.59 T

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

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

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

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

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

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

Note response to question 2. At this stage, the preferred policy approach would be to implement a floo d risk policy guiding developers to the national level guidance, and referring developers

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

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

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

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

Mr Hubbard
Respondent Ref: 151662

Representation Summary: Nitrogen dioxide pollution in Ifield la: ontation 111 0 0 /cularlatBT1 0 0 1 42.6 287.9f1 3( )6(oxn)-198(I)6e1 0 0 1 98.784 389.35 Tm42(c

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

Officer Response: Noted

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

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

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

Officer Response: Noted. The Council acknowledge that Core Strategy policies should not replicate national and regional policy,

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

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

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

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

PART

needs, including those of the elderly, vulnerable groups and gypsies. In

developed to meet the needs of specific groups".

Officer Response: Should the Nor th East Sector remain unavailable the Council will need to consider what other options are available to meet the South East Plan requirements and what, if any, contingency arrangements should be put in place. However, the Council would want to ensure that , whatever approach is adopted, new development is consistent with the sound planning principles which have governed the way in which the Town has grown.

Mr Peter Minshull
Respondent Ref: 148635
Highways Agency

Representation Summary: In general the HA is content with the approach

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

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

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

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

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

IVCAAC is also concerned that Horsham will apply pressure on land west of Crawley which is not suitable from a transport point of view. Further development in Ifield would increase traffic through the conservation area.

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

Officer Response: Noted

Miss Claire Te ster
Respondent Ref: 149286
Mid Sussex District Council

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

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

Mr Andy Evans
Respondent Ref: 149302
Miller Strategic Land (on behalf of Forest Enterprise, the Lowes family and Miller Strategic Land)

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

Miller Homes note that the preferred option is to ring fence the NE Sector,

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

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

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

Officer Response: Support for the Council accommodating the South East Plan requirement within the Borough boundary is noted, with or without the North East Sector. The con cern that the North

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

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

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

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

The discussion of the key issues relating to housing in the topic paper itself refers to the need to demonstrate contingency. The need to

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

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

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

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

Mr Keith Wall
Respondent Ref: 151563
Worth Pari sh Council

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

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

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

Objection to options 3 and 4 noted.

Mr J Chessman
Respondent Ref: 151878

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

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

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

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

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

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

We know from the map and strategy documents that the areas identified

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

Rationalised to 375 dwellings/annum, the clock is ticking. What the consultation documents do not tell you is how many sites have been

other speculative developments). There is no space in recent neighbourhood developments so these developments will be shoe horned into the original open/spacy layouts created by the Commission for the New Towns. Decision makers, please resist these trends - not hopeful.

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

The Council will consider and examine how best to accommodate the housing requirement of the South East Plan, primarily through the Strategic Housing Land

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

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

Mr B Wharton
Respondent Ref: 152314

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

Officer Response: Noted

Mr Tim Hoskinson

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

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

Representation Summary: Object to Option 1. The housing requirement is fixed for the Borough in the South East Plan. Whilst the Borough Council may chose alternative locations for meeting the housing

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

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

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

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

Mrs Barbara Childs
Respondent Ref: 148734
Horsham District Council

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

Officer Response: Note support of hybrid approach.

Note support for collaborative wo rking between LAs.

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

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

There may be a case for spreading employment around the

PART 2:

Mr Steve Brown
Respondent Ref: 151399
West Sussex County Council

Representation Summary:

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

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

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

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

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

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

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

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

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

(See original rep for detailed Gatwick response)

Officer Response: The Council note the support for continued joint

TOPIC PAPER 7 TOWN CENTRE GROWTH AND RETAIL

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

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

The HCA also considers that other Town Centre development opportunities should be identified in the Core Strategy Review, although it is acknowledged that some of these may be of a scale which may not

allocations may be considered appropriate for inclusion in the Core Strategy to demonstrate the role ascribed to the Town Centre overall and the contribution that appropriate development on these sites might make to town centre regeneration and other objectives.

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

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

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

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

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

Mrs Barbara Childs
Respondent Ref: 148734
Horsham District Council

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

take expenditure lost to higher order centres elsewhere, not to compete with the more local, market town offer of Horsham.

Miss Alison Coster
Respondent Ref: 148775

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

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

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

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

The delivery of a renaissance of the town centre would clearly enhance the attractiveness of Crawley as a destination and would be in

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

The Council has adopted a Developer Contributions and Section 106 SPD. This document sets out that a developer contributions towards environmental improvements, public art, and additional CCTV cameras will normally be sought from major developments in the Town Centre of over 10,000m ^{2} floorspace. The SPD identifies particular Town Centre areas for improvement.

The neighbourhood principle is fundamental to the planning of Crawley, and the Council will work to ensure that the neighbourhood parades continue to meet the day-to-day needs of Crawley residents. It is recognised that non-retail uses can play an important role in meeting local need, and the current policy approach is to apply an element of flexibility when determining applications for change of use from retail on neighbourhood parades, with consideration given

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

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

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

Representation Summary: TCN will accommodate some types of employers for whom a town centre location is suitable. The proposals for a strategic employment location at Gatwick Green will complement, rather than compete, with TCN. A mix of uses, including retail, residential and

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

Officer Response: Agree, that the Transport Strat egy will need to

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

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

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

Officer Respondent: Agree, that the Transport Strategy will need to

use sustainable modes of transport.

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

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

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

A strategic approach is needed to transport, and a strategy should be developed as part of wider infrastructure delivery with West Sussex

contributions
public sector top up funding) from new developments provided this meets the Circular tests and the contributions are proportional to mitigate the

PART 2:

PART 2:

ongoing programme of Environmental Improvement Schemes.

Sections of the recent Pembroke Park development in Three Bridges

supportive of such measures in appropriate locations.

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

The Transport Strategy will need to consider the impact of major developments, such as Town Centre North and the North East

Note comments with regards to Fastway and Park and Ride. The Council will b e considering this further as the Core Strategy Review progresses.

Gatwick Airport Area Transport Forum can provide valuable support for the preparation of a delivery plan and we would be keen to be participate in helping to shape this. The forthcoming M25 to Gatwick Airport study supported by the Gatwick Diamond Connect Group (on behalf of the Regional Transport Board) should also provide a strategic input into this.

Officer Response: Generally agree with comments, and note Gatwick's commitment to encouraging sustainable modes of transport and the support for an implementation plan. The Council will continue to work in partnership with Gatwick in delivering improvements to the transport infrastructure in the Borough.

Note comments in relation to Park and Ride.

2. Beyond the requirement to safeguard land, how should the Core Strategy Review deal with the possibility of a second runway given the potential impacts towards the end of the plan period?

The possibility of Airport expansion is beyond the remit of the LDF being an issue for the Infrastructure Planning Commission (IPC) and National Planning Statements (NPS). However, the Council through LDF production and the associated SA/SEA has the opportunity to formulate a view on airport expansion in terms of localised planning / environmental impacts. This evidence could be used to determine not only a Council position on the expansion, but also the type of associated development close to the Airport, not least the role of the North East Sector.

It may be that should the expansion be implemented, alternative areas in/ around Crawley, such as West of Crawley, be considered for additional

the issue, and recognise the role of the IPC and NPS.

3. Should the Council continue to restrict the use of office space at the airport to airport related uses?

Expansion of offices at accessible locations should be encouraged as this facilitates employment and in turn facilitates sustainable communities in the wider area. This does not necessarily mean that all offices should be town centre. Gatwick, through its excellent rail/ bus links, is a very accessible location.

Officer Response: Position with regards to growth of the airport and how this relate s to the IPC and NPS is noted and will be addressed at the Preferred Strategy stage.

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

Representation Summary: SEEDA consider that the Core Strategy should continue to safeguard land for a second runway at Gatwick Airport

Officer Response: Position on second runway i s noted.

Mr Richard J. Evans
Respondent Ref: 150656
Surrey County Council

Representation Summary: We continue to support continued commitment to joint working over Gatwick issues.

Officer Response: Support is noted.

Mr John Phillips
Respondent Ref : 150839
Tandridge District Council

Representation Summary:

<u>Surface Access</u>
There is no indication that Crawley Borough Council supports the principle of the redevelopment of Gatwick Station. The redevelopment of Gatwick Station is a much needed and significant major project of local

Officer Response: Position on second runway is noted.

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

Representation Summary: The Council should safeguard adequate land within the airport boundary for operational purposes. Gatwick Green proposal can operate successfully in either a one runway or two runway scenario Phase 1 of Gatwick Green remains clear of all future access requirements for a future runway. Later phases will be considered concurrently with any future runways and access proposals.

Office floorspace within the airport boundary should be restricted to that associated with the operation of the airport, in order to protect the airports expansion capability.

Officer Response: Comments on relationship between Gatwick Green proposals and potential future runway requirements are noted.

Mrs Julia Dawe
Respon dent Ref: 150037
Reigate and Banstead Borough Council

Representation Summary: Wording in blue refers to the "opportunity to shape the way the town development..." With regard to Gatwick Airport although it is within the CBC boundary most people would not regard it to be in the town. Future consultations should make this clear.

Support CBC's continued support of the growth of Gatwick up to 40mppa as a two terminal, one runway airport.

The timeframe of the CSR and the publication of the SEP results in the topic paper to recognise the need to safeguard land for a possible second runway and address the possibility that a second runway could be developed in the latter part of this plan. RBBC believes this is the correct approach, however due to the uncertainty about the need or impact of a second runway, detailed plans or polices for the development of a second runway at the airport would not be needed in a revised CS.

Officer Response: Position on growth of Gatwick airport is noted.

Mr Derek Meakings
Respondent Ref: 151803

Representation Summary: If the North East Sector is developed then the potential major road problems created by the currently proposed changes to the Balcombe Road will create a further potentially disastrous problems (will definitely cause problems for access from the south to East Surrey Hospital) whenever the M23 and/or M25 east of the M23, become blocked and traffic uses the A25/A22 and other country roads to access Gatwick. Access to the Gatwick M23 junction from the east must be developed.

To provide access to Gatwick from the west the proposed West of Ifield development must include a west/northern by pass.

Officer Response: If the NES is developed, there will need to be improvements carried out by the developer to mitigate a ny effect of the development as identified by transport assessments. The need

Ms Rita Burns
Respondent Ref: 148288
Gatwick Airport

Representation Summary: The requirement to safeguard land for a possible second wide-spaced runway at Gatwick is still a key planning policy at a national, regional and local level. It is vital that the CSR maintains a policy for safeguarding land for a possible new runway at Gatwick. The CSR adopts the principles in national aviation policy and

Respondent Ref: 148858
Telcon Ltd

Representation Summary: Need to encourage use of countryside as parks or leisure type use.

Officer Response: Noted this accords with para 26 of PPS7 which encourages improvement of public access to the countryside around urban areas through support for Country Parks, Community Forests and facilitating the provision of appropriate sport and recreation facilities.

It may be worth bringing more emphasis to Landscape Character within the criteria suggested for the BUA. Suitable wording suggested.

Officer Response: Noted

Mr Keith Wall
Respondent Ref: 151563
Worth Parish Council

Representation Summary: Bearing in mind the rural nature of the Parish it is essential to retain a separation (formerly a "strategic gap") between the Parish and its Urban neighbours both to the west and to the east.

Officer Response: The separate identity of settlements will be main tained through criteria based policy justified by evidence.

Mrs H Eves
Respondent Ref: 152306

Representation Summary: CBC should work with Sussex Wildlife trust.

Officer Response: Noted

Mr B Wharton
Respondent Ref: 152314

Representation Summary: Unfortunately, Crawley's record in protecting the countryside has not been good. It has let people move in and simply built up to its boundaries, including former Horsham and Worth land.

As there are open spaces and green corridors within the town people should be encouraged to use them. Effectively, these green avenues are our countryside. Leave the open spaces and corridors within and people will use them. Destroy them, as has been occurring, and you will force more people out into the open countryside.

Officer Response: Agree that use of green corridors and open space should be encouraged

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Mr Tony Fullwood (on behalf of Mrs Williams and Mr M Robinson)
Respondent Refs: 149746 and 146753

Representation Summary: Object to the Topic Paper identifying the limited amount of countryside within the Borough as a Key Issue. Access to the countryside around Crawley (rather than the amount within the administrative boundary) should be identified as the Key Issue for the town as the borough boundary is unlikely to be perceived as a barrier to accessing the countryside. The location of the administrative boundary is already cited as irrelevant in relation to housing provision (potentially outside the Borough boundary) and it is therefore illogical to identify countryside within the borough boundary as a Key Issue. Cross-boundary talks, advocated in relation to potential housing sites, are equally valid in relation to access to the countryside and such a proposal should have been included in the Topic Paper and should be implemented in any future stages of plan development.

The Topic Paper refers to a recent review of the Built Up Area Boundary although this has not been made available as part of this consultation. I would request consultation on this document. Detailed comments are provided on the BUAB Review.

The BUAB has been reviewed against the guiding principles. However, it is not complete as the review is an ongoing process. It was originally intended that the assessment so far would be part of the non statutory ever,

the review updated accordingly. The review also needs to take into account other assessments such as the Characterisation Assessment as well as proposed strategic development opportunity sites that are identified through the Core Strategy review and are located outside or extend beyond the Built-up Area Boundary.
Gatwick Green

Some areas of countryside in the vicinity of Gatwick Airport and M23 do not offer high quality countryside as those areas further away from these areas. As a result some areas of land to the east of Gatwick do offer opportunities for accommodating necessary forms of development to be implemented without affecting more valuable countryside.

The Strategy Gap should be removed from the Core Strategy Review for reasons stated by the Inspector at the last Core Strategy examination and in accordance with government advice which advises the deletion of strategic gaps from planning policy.
(*Further detail in rep*)

Officer Response: Comment regarding countryside as a cross boundary key issue is noted.

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Mrs Tricia Butcher
Respondent Ref: 146852
British Horse Society

Representation Summary: The current policy approach of protecting sites unless proven to be surplus is still relevant. In fact, even more so today with growing pressure for development. The Council should consider a limited release of some of the lower quality and poorly used sites to help meet the need for development land. This should only happen, however, after thorough investigation and consultation with the local community.

Informal recreation facilities, especially multi-use public right-of-way (PROW) and greenways are considered to be particularly important and should be protected. Keen to see access to the PROW network and the wider countryside, protected and improved. Over the years the network has become fragmented by development and increased volumes of traffic on roads. This needs to be addressed, so that all users - walkers, cyclists and horse riders - can safely enjoy these paths. It is important that paths link safely both around and through the town and to the countryside beyond.

Other documents relevant to the Core Strategy Review are the West Sussex Rights of Way Improvement Plan, Strategic Framework 2007 - 2017 and Natural England's Access Policy 3.

Officer Response: The suggestions are noted and opportunities for new PROW can be explored as part of the update to the PPG17 assessment.

Mrs Pippa Aitken
Respondent Ref: 147710
CB Rich ard Ellis (The Homes and Communities Agency)

Representation Summary: As suggested in relation to the Countryside

Respondent Ref: 148833
Ifield Village Conservation Area Advisory Committee

Representation Summary: Trees and open spaces running through the town are fundamental to the town design and need protection, and IVCAAC would support the current policy approach as much as possible.

visited frequently is not necessarily surplus. Likewise, the definition of

counting the amount of people who go there. Special protection should be given to Ifield village green, as it the only registered village green in the town, whilst allotments are also an important resource to be protected.

Officer Response: The support for the current policy approach is noted. The issue of assessing whether a site is surplus or of low quality is a subjective process and each site will need to be considered individually, in consultation with the local community and with an understanding of the local levels of provision. For example, if there were two similar sites in close proximity to each other, possibly of relatively low quality, then the loss of one site might be able to fund improvements to the other, potentially resulting in one valued and high quality space. The issue of the snapshot approach should be addressed with each subsequent update to the PPG17 assessment, and to support the Submission Core Strategy the PPG17 will be updated. The special status of Ifield Village Green and allotments can be explored within the upd ate to the PPG17 assessment.

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

Representation Summary: Some of these areas are vulnerable to development pressure; they should not be. Many Crawley residents seem to view an area of open grass as a waste of space, and would prefer development in the form of sports facilities, a café etc. These areas could

deliver even more open space if it will place more pressures on nearby existing open space. New development with good linkages to existing open space could enhance this as a qualitative measure rather than just increasing the quantity.

The value of good urban design and architecture should be noted. Crawley as a new town is characterised by a post modern vernacular, with associated impacts on economic value. Through a long term strategy of change the perception and value of Crawley can be enhanced.

2. Should the Council consider a limited release of some of the lower quality and poorly used sites to help meet the need for development land?

Yes, should evidence demonstrate. A pragmatic approach to large areas of public open space should be taken, in that it is likely that such does not contribute towards the quality of place in a number of locations. See question 1 above.

3. Are there any particular areas/types of open space/recreation facilities that are of particular importance to you?

The existing Leisure facilities at Bewbush should be safeguarded in some form, including some, perhaps not all, sports facilities located within the Bewbush area. This will assist with the integration with the proposed development West of Bewbush.

Officer Response: Agree with response to first question. The issue of balancing quality and quantity requ ires additional work to ensure the baseline established within the Core Strategy Review is accurate

Mr B Wharton
Respondent Ref: 152314

Representation Summary: This is one area that does not need any development. This needs protection. The principles of New Town/garden cities are just as vital now as ever. Crawley's green spaces have been declining every year. We have to try and control the area's development not let it increase rapidly.

Officer Response: Work as part of the Core Strategy will seek to identify and protect areas of the built environment that have a value in terms of structural landscaping and amenity and play value. It is the intention to strengthen the policy whe re possible.

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

Representation Summary: No comment on protecting open space or release of sites to meet the need for development land

Gatwick Greens proposed site offers opportunities for accommodating strategic development along with environmental improvements etc and other infrastructure.
(*more detail in rep*)

Officer Response: Noted

Mr Tony Fullwood
Respondent Ref: 146753
On beh alf of Mrs Williams

Representation Summary: Support the option which undertakes a strategic review of open space with a review to releasing some underused sites, or where there is already sufficient provision. Objections are made elsewhere to the factual accuracy of the Open Space, Sport and Recreation Study which will require correction.

Nevertheless, the Study correctly identifies two of the main issues for open space provision in Crawley which have arisen through the strategic review as:

full or part is suitable for residential development will be made once a review of the Worth Conservation Area is complete.

Miss Claire Tester
Respondent Ref: 149286
Mid Sussex District Council

Representation Summary: Constraints on infrastructure in this part of the region are well known. There needs to be an acknowledgement that joint working with adjacent local authorities to plan for infrastructure to support future development 'at Crawley' will be reqsex Dis8ste Crp36()-3(e)1(t)6(he(8)13(ex(t)-ami)5o),1(')-435(t)-s8ETos trfutur

Thames Water Plc

Representation Summary: The Core Strategy should include a separate infrastructure policy on waste water management, to accord with the South East Plan, in particular Policy NRM2 relating to water quality, and the need to ensure that adequate wastewater and sewerage capacity is provided to meet planned demand (suggested policy wording and supporting text is included to this effect).

Thames Water has applied for additional treatment capacity to be made

Respondent Ref: 151878

Representation Summary: Barely considering infrastructure and no hospital.

Officer Response: It is essential that sufficient infrastructure is rowth. The Infrastructure ***and Implementation*** Plan being prepared to support the Core Strategy Review will help achieve this.

The Council has been liaising with West Sussex PCT with regards to the health facilities provided in the borough. Indeed, the shared Position Statement agreed with the PCT earlier this year can be

statement, the PCT consider that there is currently an appropriate ts. The Council will continue to meet with the PCT to monitor this situation

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Mrs J Raish
Respondent Ref: 152264

Representation Summary: There should be more green areas, play areas, health centres and special places for the elderly to live in. Schools are overcrowded.

Officer Response: These comments are noted. It is essential that

growth. The Infrastructure and Implementation Plan being prepare d to support the Core Strategy Review will help achieve this.

Mr B Wharton
Respondent Ref: 152314

Representation Summary: As usual with Crawley and the South East of England, everything requires space. The size and density of Crawley's population means there is little land inside the built up area to handle further rapid and large population increases. Crawley is big enough to generate a separate satellite town.

Officer Response: See Officer Responses to Topic Papers 1 and 5.

TOPIC PAPER 13 SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITAT REGULATIONS ASSESSMENT

Miss Katie Gosling
Respondent No: 148072
Environment Agency

Representation Summary: Topic Area A covers climate change and sustainability, though there is no mention of water supply, and water quality is not really addressed. We recommend SUDS wherever possible

Representation Summary: SWT would like to see in combination effects and future needs in terms of adaption to climate change properly assessed within this process. Sussex Biodiversity Record Centre holds biodiversity data for Sussex. Up to date ecological information derived from surveys is vital to the evidence base.

Officer Response: The in -combination effects will be incorporated within the SA once a policy direction is developed and the draft SA will provide more details. Furthermore, refere nce to adaptation to the impacts of climate change will also be considered further in preparing the draft SA. The SWT ecological data is noted.

Cllr Chris Cheshire
Respondent Ref: 150813
TAG

Representation Summary: Whilst noting that the main thrust of this topic area concerns the provision of dwellings, our main concern is the development of policies that ensure appropriate provision. This echoes 2.2 in the Scoping Report regarding sustainable development. We would add to the evidence quoted under paragraph 3.39 (Section C) to refer to the acknowledged need to provide accessible accommodation for increasing numbers of disabled people of all ages able to live independently in the community.

Reference should also be made to the increasing pressure on Disabled Facilities Grant Funding, and the waiting list for aids and adaptations work for Crawley Homes. The acceptance of such need is welcome, as expressed in Topic Area G. We believe that it should be policy that all social housing facilitated by Crawley Borough Council should be built to Lifetime Homes standard.

Consideration should also be given to encouraging the building of Lifetime Homes by private developers by setting percentage targets. It is currently policy in Wales and Northern Ireland that all public sector funded housing will be built to Lifetime Homes standard. This is due for implementation in England from 2011.

Officer Response: Noted. This issue will be considered further as the Council produces the draft SA to accompany the Preferred Strategy.

Mr Jim Piercey
Respondent Ref: 150821
Crawley Older Person's Forum

Representation Summary: Whilst noting that the main thrust of this topic area concerns the provision of dwellings, our main concern is the development of policies that ensure appropriate provision. This echoes 2.2 in the Scoping Report regarding sustainable development. We would add to the evidence quoted under paragraph 3.39 (Section C) to refer to the acknowledged need to provide accessible accommodation for increasing numbers of disabled people of all ages able to live independently in the community.

Reference should also be made to the increasing pressure on Disabled Facilities Grant Funding, and the waiting list for aids and adaptations work for Crawley Homes. The accept

Ms Rose Freeman
Respondent Ref: 151043
The Theatres Trust

Representation Summary: No definition of 'community facilities'. This should be defined for greater clarity and certainty of outcomes. Would recommend 'community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community' to ensure a

borough continues to grow in a sustainable manner and enable both new and ex isting residents to enjoy a high quality of life. The SA will help the Council achieve this by considering economic, environmental and social impacts equally and proposing mitigation measures where conflicts arise.

Mr Tim Hoskinson
Respondent Ref: 15 0185
Savills (on behalf of the Gatwick Green Consortium)
(For full comments see rep)

Representation Summary: The proposed topic area in relation to the economy should refer to the need for a strategic employment provision to address the wider regional and

of sustainable construction is already addressed through Sustainability Appraisal Objective One .

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

Representation Summary: Object to SA Objective 3.
The objective as currently worded does not recognise the national objective of enhancing culturally valuable areas such as Conservation Areas (as set out in PPG15), AONBs (as set out in PPS7), sites of archaeological interest and of their settings (PPG 16) some of which are not located within the town. Objective 3 should be reworded as follows:
Sustainability Appraisal Objective Three To protect and enhance the culturally valuable areas and buildings and valued built environment and character through high quality new design

Object to SA Objective 4:
The objective as currently worded does not seek to deliver the RSS housing requirement and so ensure that all have access to a decent home. Objective 4 should be reworded as follows: