

# Crawley Borough Council

## Cabinet

Agenda for the **Cabinet** which will be held in **Committee Rooms A & B**  
**- Town Hall, on Wednesday, 2 November 2022 at 7.00 pm**

Nightline Telephone No. 07881 500 227



**Chief Executive**

**Membership:**

**Councillors**

M G Jones (Chair)

S Buck

G S Jhans

S Malik

C J Mullins

S Mullins

A Nawaz

Leader of the Council

Cabinet Member for Housing

Cabinet Member for Environmental Services  
and Sustainability

Cabinet Member for Resources

Deputy Leader of the Council and Cabinet  
Member for Wellbeing

Cabinet Member for Public Protection and  
Community Engagement

Cabinet Member for Planning and Economic  
Development

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The order of business may change at the Chair's discretion

## Part A Business (Open to the Public)

	<b>Pages</b>
<b>1. Apologies for Absence</b>	
<b>2. Disclosures of Interest</b>	
In accordance with the Council's Code of Conduct, councillors are reminded that it is a requirement to declare interests where appropriate.	
<b>3. Minutes</b>	5 - 12
To approve as a correct record the minutes of the Cabinet held on 5 October 2022.	
<b>4. Public Question Time</b>	
To answer any questions asked by the public which are relevant to the functions of the Cabinet.	
Public Question Time will be concluded by the Chair when all questions have been answered or on the expiry of a period of 15 minutes, whichever is the earlier.	
<b>5. Matters referred to the Cabinet and Report from the Chair of the Overview and Scrutiny Commission</b>	
To consider any matters referred to the Cabinet (whether by a scrutiny committee or by the Council) and those for reconsideration in accordance with the provisions contained in the Scrutiny Procedure Rules, the Budget Procedure Rules and the Policy Framework Procedure Rules set out in Part 4 of the Council's Constitution.	
<b>6. Proposals to Introduce New Conservation Areas and Change Existing Conservation Area Boundaries</b>	13 - 62
<i>Planning and Economic Development Portfolio</i>	
To consider report PES/419 of the Head of Economy and Planning, which was referred to the meeting of the Overview and Scrutiny Commission on 31 October 2022.	

	<b>Pages</b>
<b>7. Allocating Monies Collected Through CIL, Neighbourhood Improvement Strand.</b>	63 - 70
<i>Planning and Economic Development Portfolio</i>	
To consider report PES/420 of the Head of Economy and Planning.	
<b>8. Supplemental Agenda</b>	
Any urgent item(s) complying with Section 100(B) of the Local Government Act 1972.	

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## Crawley Borough Council

### Minutes of Cabinet

Wednesday, 5 October 2022 at 7.00 pm

#### Councillors Present:

M G Jones (Chair)	Leader of the Council
S Buck	Cabinet Member for Housing
G S Jhans	Cabinet Member for Environmental Services and Sustainability
S Malik	Cabinet Member for Resources
C J Mullins	Deputy Leader of the Council and Cabinet Member for Wellbeing
S Mullins	Cabinet Member for Public Protection and Community Engagement
A Nawaz	Cabinet Member for Planning and Economic Development

#### Also in Attendance:

Councillor T G Belben, R D Burrett and D Crow

#### Officers Present:

Natalie Brahma-Pearl	Chief Executive
Karen Hayes	Head of Corporate Finance
Chris Pedlow	Democracy & Data Manager
Clem Smith	Head of Economy and Planning
Siraj Choudhury	Head of Governance, People & Performance

#### 1. Disclosures of Interest

The following disclosures of interests were made:

Councillor	Item and Minute	Type and Nature of Disclosure
Councillor Nawaz	Proposed Manor Royal Business Improvement District (BID) Renewal ('BID 3')  (Minute 8)	Personal and Prejudicial Interest – Local Authority Director of the Manor Royal Business Improvement District, as the Cabinet Member for Planning and Economic Development  Councillor Nawaz left the room for this item

# Agenda Item 3

Cabinet (24)  
5 October 2022

## 2. Minutes

The minutes of the meeting of the Cabinet held on 7 September 2022 were approved as a correct record and signed by the Leader.

## 3. Public Question Time

There were no questions from the public.

## 4. Matters referred to the Cabinet and Report from the Chair of the Overview and Scrutiny Commission

It was confirmed that no matters had been referred to the Cabinet for further consideration.

## 5. 2022/2023 Budget Monitoring - Quarter 1

The Leader presented report [FIN/586](#) of the Head of Corporate Finance. The report set out a summary of the Council's actual revenue and capital spending for the first quarter to June 2022 together with the main variations from the approved spending levels and impact on future budget. It was noted there was a variance of £671k in the general fund. At budget setting, it had assumed a transfer from reserves of £452,000, so there is now projected to be a £1.1m transfer from the general fund reserve at the end of the year. The Cabinet were informed that there had been unprecedented demand for the Council's homelessness services leading to a projecting of £872,000 overspend.

The Head of Corporate Finance addressed the Cabinet noting that the original report sent to Members had a slight addition error within the appendices, (pages 8, 9 and 10). A correct version of the report had been sent to the Cabinet prior to the meeting.

Councillor T Belben presented the Overview and Scrutiny Commission's comments on the report to the Cabinet following consideration of the matter at its meeting on [3 October 2022](#), which included:

- The Commission noted that the budget for the 2022/23 pay award had an allowance for 2%, this was likely to be higher leading to a projected overspend was therefore at least £800,000.
- They were pleased that K2 Crawley continued to move back to pre-pandemic usage and for the additional income projections at Quarter 1.
- Acknowledgement of the pressures and concerns within Homelessness as the service.

Councillor S. Mullins also spoke as part of the discussion on the report.

### RESOLVED

That the Cabinet:

- a) Notes the projected outturn for the year 2022/2023 as summarised in this report [FIN/586](#).

- b) Approves the addition of £40,000 to the capital programme, funded from the Tilgate Park Investment Reserve, for a replacement tractor flail as outlined in section 8.7 of this report [FIN/586](#).

## Reasons for the Recommendations

To report to Members on the projected outturn for the year compared to the approved budget.

*Note by the Head of Governance, Performance and People – The amendment and correct version of report [FIN/586](#) has been now be published online replacing the original publish version.*

## 6. Budget Strategy 2023/24 - 2027/28

The Leader presented report [FIN/583](#) of the Head of Corporate Finance. The report set out financial projections with particular reference to the period 2023/24 – 2027/28 for the General Fund, Housing Revenue Account, capital programme and the underlying assumptions. The report set out the policy framework for improving financial efficiency and meeting the long-term investment needs of the Town, as well as proposals for the annual budget process.

It was noted that the proposed budget would be formed under the background of high inflation and the cost-of-living crisis as such assumptions were changing on a daily basis. Also, which was mentioned in the quarterly reporting, there was a pay award pending and was expected to be £800k more than budgeted for and this would be addressed in the mid-year strategy would be before the Cabinet later this year.

It was noted that currently there was a budget deficit of £204,109 for 2023/24, before use of reserves and before any savings were identified and based on a Council tax increase of 2.21% which was £4.95 on a Band D in property and an increase of fees and charges of 5%, (which was lower than inflation) for 2023/4.

Councillor T Belben presented the Overview and Scrutiny Commission's comments on the report to the Cabinet following consideration of the matter at its meeting on [3 October 2022](#), which included:

- Acknowledgement that the Council's projected budget deficit was higher than previously anticipated due to the impact of increasing inflation, increased homelessness costs, future Council tax and Business rates income projections and impact of the cost-of-living crisis on other income sources such as fees and charges.
- Members of the Commission commended officers from the Finance Team for their work in producing finance reports and dealing with challenging issues.

Councillor Crow was invited to speak on the item, including accepting that it was a moving feast in terms of the budget setting process. Also that it was hoped that the Council would be able to maximise the rental income of the office space within the new Town Hall going forward despite the delays in the opening and the move to the new building.

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5 October 2022

Councillors C Mullins, Jhans and S Mullins spoke as part of the discussion on the report.

## RESOLVED

That the Full Council be recommended to approve the Budget Strategy 2023/24 to 2027/28 and to:

- a) Approve the process for meeting the gap as outlined in section 8 of report [FIN/583](#).
- b) Approve to continue with the policy of balancing the budget over a four-year period, including putting back into reserves when the Budget is in surplus. This is due to the current economic climate.
- c) Note the following highlights of the Budget Strategy:
  - i. that the Budget is aligned to the Council's Corporate Priorities.
  - ii. that the current budget deficit of £204,109 for 2023/24 is based on a Council tax increase of 2.21% which is £4.95 and increases in fees and charges of 5% on average. However table 9 in report [FIN/583](#) highlights that the gap could be higher when looking at sensitivity analysis.
  - iii. that the outline 5 year forecast as shown in table 3 of report [FIN/583](#).
  - iv. that the savings identified by the Corporate Management Team challenge of budgets of £413,080 have been included within the budget projections.
  - v. that there are uncertainties around Government funding prior to the settlement in December and the delay in Local Government Funding reforms such as business rates retention and the future of New Homes Bonus.
  - vi. that despite having a £5.26m General Fund reserve that the budgeted use of this reserve was £451,730 at the beginning of the current financial year, however there is a projected overspend in year due to the cost-of-living crisis and its impacts and with so many financial uncertainties the reserve must remain between £3m and £5m. The Council cannot rely on using reserves in the long term to balance the budget.
  - vii. that no additional revenue budgets have been budgeted towards the costs of the Climate Change commitment at this stage. Table 10 within report [FIN/583](#) shows existing capital commitments to Climate Change.
  - viii. that items for the Capital Programme are driven by the need for the upkeep of council assets and environmental obligations and schemes will also be considered that are spent to save or spend to earn but that such prioritisation should not preclude the initial consideration of capital projects that could deliver social value.
  - ix. that costs associated with splitting upper floors for the New Town Hall were not included within the original budget. Any costs will be added to the capital programme but will be funded from rental income.



- x. that an update on this strategy will be presented to Cabinet on 23<sup>rd</sup> November 2022, this will include capital bids and the revised Crawley Homes capital investment plan.

## Reasons for the Recommendations

To continue with the implementation of the Council's budget strategy and to deal with the Council's projected budget deficit which is higher than previously anticipated due to the impact of increasing inflation, increased homelessness costs, future Council tax and Business rates income projections and impact of the cost-of-living crisis on other income sources such as fees and charges.

To reaffirm the criteria for capital programme bids.

To note that until the Local Government Finance Settlement is known in December 2022 these projections are highly likely to change. Revised projections will be presented to Cabinet in November 2022 due to these constant changes, such as inflation and demands on services such as Homelessness. At that meeting any revenue growth bids, capital bids, and the HRA capital investment plan will also be reported for approval.

## 7. Proposed Increase of Weekly Rent to Council Owned Garages

The Leader presented report [CEX/59](#) of the Chief Executive. The report sought approval for the mid-year increase as part of the budget setting strategy with reference to weekly rent to Council-owned garages and storage cupboards. It was acknowledged even with the proposed increase renting garages from the Council would still be of good value for residents and much lower than alternative forms of storage and most other local similar local authorities. It was noted that the changes to multiple tenancies and to non-Crawley residents means that they would now be paying a premium for multi garages and if they are not prepared to then it would enable more residents on the waiting list to have the opportunity to be able to rent a garage sooner.

Councillor T Belben presented the Overview and Scrutiny Commission's comments on the report to the Cabinet following consideration of the matter at its meeting on [3 October 2022](#).

Councillors Buck and S Mullins spoke as part of the discussion on the report. It was requested that a list of the exact number of Council-owned garages and storage cupboards and the wards be included in the Council's information bulletin, so that Councillors were aware what was in their ward.

## RESOLVED

That Full Council be recommended to approve change in garage and storage cupboard fees, as detailed in Section 5 report [CEX/59](#) and to:

- a) Increase rental fees with effect from 1 December 2022, with no further increase until April 2024 as follows:
  - i) weekly garage rental costs for Crawley Homes tenants,

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- ii) weekly garage rental cost for Private Tenants residing in Crawley
  - iii) weekly rental costs of storage cupboards
- b) Introduce an additional charge for Crawley Homes tenants and Crawley resident private tenants with three or more garages.
  - c) Introduce a new non-Crawley Borough resident weekly garage rental cost.
  - d) Introduce an additional charge for non-Crawley Borough residents with two or more garages.
  - e) Remove the previous multi garage discount from any remaining accounts.

## Reasons for the Recommendations

The Budget Strategy 2023/24 – 2027/28 (FIN/583) elsewhere on this agenda identifies in Table 3 an initial budget gap of £240,000 in 2023/24, this rises to £419,000 in 2024/25. This assumes an increase in fees and charges of 5% on average, as financially modelled. Table 9 in the same report identifies some sensitivity analysis and shows large increases in the gap should the pay award for Local Government employees be higher or inflation be higher, or further pressure on providing temporary accommodation for those we owe a duty - therefore additional income from garages would support meeting future gaps.

## 8. Proposed Manor Royal Business Improvement District (BID) Renewal ("BID 3")

The Leader of the Council invited the Head of Economy and Planning to present report [PES/421](#). The report sought Cabinet support for the renewal of the Manor Royal BID for a third five-year period, for the Manor Royal BID's Business Plan 2023-2028 and Cabinet approval for the Council to continue to undertake the role of Ballot Holder, as well as Billing Authority for the BID, should a majority of BID levy payers vote to continue the BID. The Cabinet were reminded that Manor Royal BID was the largest in the South East, comprising of over 600 businesses, 30,000 jobs and over 9 million sqf of commercial space.

Councillor Jones spoke in support of renewing the BID.

## RESOLVED

That the Cabinet:

- a) agrees that the Council continues to perform the role of billing authority for a further five years, collecting the BID levy on behalf of the Manor Royal BID, subject to the BID securing renewal.
- b) agrees and request that the Chief Executive as Returning Officer and Ballot holder should hold a Ballot for the Manor Royal BID Renewal proposal.
- c) agrees that the Head of Governance, People and Performance be authorised to complete the necessary legal agreements required for the BID levy operation together with any other necessary documents for the proposed BID renewal.

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- d) agrees the proposal from the Manor Royal BID to support the renewal of the BID (BID 3) for a further five-year term.
- e) requests the Leader of the Council to cast the vote (for the Council's own rated properties in the Manor Royal BID area) in accordance with the Cabinet decision for 2.1d) during the period of Ballot (see section 7 of report [PES/421](#)).

## Reasons for the Recommendations

Since the outcome of the Ballot for the Manor Royal BID's second term permitted a maximum five-year BID period to 31 March 2023, a renewal Ballot for a third term is therefore required amongst Manor Royal levy payers to determine whether the majority wish for the Manor Royal BID to continue for a further five years. Cabinet is therefore being asked to agree the Manor Royal BID's renewal proposal.

The Borough Council also needs to determine whether it wishes to continue to undertake the role of billing authority, collecting the BID levy on behalf of the BID, subject to legal agreement.

The BID Regulations require the Council as "billing authority" to instruct the "Ballot Holder" to hold the renewal ballot. The Ballot Holder is "the person the relevant billing authority has appointed under section 35 of the Representation of the People Act 1983 (a) as the Returning Officer for elections to that authority" – i.e., the Chief Executive.

Given the Council owns three rateable property hereditaments in the Manor Royal BID area (see Section 6.8), it will be required to pay a BID levy should the BID be renewed for a third term. This entitles the Council to vote during the period of the BID Ballot as a levy payer.

The Council is required to ensure that the process associated with BID renewal and the operation of the Manor Royal BID during a third term (subject to a "YES" vote) is undertaken in accordance with the Business Improvement Districts (England) Regulations 2004.

## Closure of Meeting

With the business of the Cabinet concluded, the Chair declared the meeting closed at 7.54 pm

**M G JONES**  
Chair

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## Crawley Borough Council

**Report to Overview and Scrutiny Commission**  
31 October 2022

**Report to Cabinet**  
2 November 2022

### **Proposals to Introduce New Conservation Areas and Change Existing Conservation Area Boundaries**

Report of the Head of Economy and Planning - **PES/419**

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#### **1. Purpose**

- 1.1. This report seeks Cabinet approval to:
- Designate two new Conservation Areas:
    - Queens Square and The Broadway, and
    - Gossops Green Neighbourhood Centre;
  - Alter the boundaries of two of Crawley's existing Conservation Areas: Crawley High Street, and St Peter's.

#### **2. Recommendations**

- 2.1. To the Overview and Scrutiny Commission:

That the Commission consider the report and decide what comments, if any, it wishes to submit to the Cabinet.

- 2.2. To the Cabinet

The Cabinet is recommended to:

- a) i) Agree that the area outlined in red in Appendix A is an area of special architectural or historical interest, the character of which it is desirable to preserve or enhance; and
- ii) Designate the area outlined in red in Appendix A as a conservation area pursuant to Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, to be known as the "Queens Square and The Broadway Conservation Area";
- b) i) Agree that the area outlined in red in Appendix B is an area of special architectural or historical interest, the character of which it is desirable to preserve or enhance; and
- ii) Designate the area outlined in red in Appendix B as a conservation area pursuant to Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, to be known as the "Gossops Green Neighbourhood Centre Conservation Area";

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- c) i) Agree that those parts of the existing High Street Conservation Area (as outlined by the dashed blue line but excluding the hatched areas in Appendix C) plus the additional adjacent areas (collectively the area outlined in red in Appendix C) is an area of special architectural or historical interest, the character of which it is desirable to preserve or enhance; and
  - ii) Vary the designation of the existing High Street Conservation Area to the area outlined in red in Appendix C, pursuant to Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990;
- d) i) Agree that the existing St Peter's Conservation Area (as outlined by the dashed blue line in Appendix D) plus the additional adjacent areas (collectively the area outlined in red in Appendix D) is an area of special architectural or historical interest, the character of which it is desirable to preserve or enhance; and
  - ii) Vary the designation of the existing St Peter's Conservation Area to the area outlined in red in Appendix D, pursuant to Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990;
- e) that the Head of Economy and Planning be authorised to take such steps as necessary, on behalf of the council as Local Planning Authority, to give notice of each of the above designations and amendments as required by legislation (Generic Delegation 7 will be used to enact this recommendation).

## 3. Reasons for the Recommendations

- 3.1. Queens Square and The Broadway, Northgate (Appendix A of report PES/419) is considered an area of special architectural or historic interest due to its distinctive new town character. Conservation Area designation will enable the Council as Planning Authority to work with developers / stakeholders / planning applicants to preserve / enhance Crawley's New Town character as a real design asset to attract investment and improve the quality of the business / living environment in Crawley Town Centre.
- 3.2. Implementation of the recommendations will help to secure the preservation and enhancement of Crawley's historic environment in accordance with legislation, national planning policy and best practice, and will contribute to the council's wider regeneration and place-making objectives.

## 4. Background

- 4.1. Crawley Borough currently contains 11 designated Conservation Areas. These are heritage assets defined in national planning legislation as 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'.<sup>1</sup> They enjoy special status and consideration within the planning system. A tighter planning regime operates in such areas and the council is required to develop proposals for their preservation and enhancement, typically in the form of supplementary planning guidance (Conservation Area Statements). The council as local planning authority for the borough is responsible for designating Conservation Areas and for keeping their boundaries under review.

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<sup>1</sup> The Planning (Listed Buildings and Conservation Areas) Act 1990, Section 69(1)(a).

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- 4.2. A number of Conservation Area Advisory Committees, made up of local volunteers, also advise the council regarding the performance of these functions and participate in the preparation of Conservation Area Statements, which are formally adopted by the council and provide detailed guidance regarding the heritage significance of the respective area and the ways in which change can be accommodated, including to boost investment, while preserving or enhancing this significance.
- 4.3. During 2020 the council procured heritage consultants Place Services to review aspects of its approach to the designation of heritage assets, in order to support and inform the review of the Local Plan. This work included the review of a number of Conservation Areas, as well as other types of heritage asset.
- 4.4. The consultants were specifically asked to review the boundaries of the Brighton Road, Hazelwick Road, High Street, and St Peter's Conservation Areas, these being the Conservation Areas where the relevant Advisory Committee had suggested boundary changes. In addition a number of areas were assessed for potential designation (or retention) as Areas of Special Local Character (ASLCs). ASLCs are a separate class of heritage asset, designated through the Local Plan process, representing areas which have some local historic and/or architectural interest, but which are not of sufficient importance to merit Conservation Area status.<sup>2</sup>
- 4.5. In the case of two of these areas, however, the consultants considered that Conservation Area status was justified. These are: Gossops Green Neighbourhood Centre and an area centred on Queens Square and The Broadway in the town centre. The resulting proposed recommendations were subject to public consultation between 5 February and 31 March 2021.

## **5. Description of Issue to be Resolved**

- 5.1. A Cabinet decision is required to implement the consultants' recommendations in respect of Crawley's Conservation Areas. Other aspects of the recommendations arising from the consultants' study, relating to other types of heritage asset, are subject to separate procedures.<sup>3</sup>
- 5.2. This report's recommendations in section 3 arise from the results of the above review undertaken by consultants on Crawley's heritage assets. In addition to the recommendations currently proposed the consultants also recommended a proposed extension to the Brighton Road Conservation Area. Further work is considered necessary to establish the correct relationship between the Brighton Road Conservation Area and the nearby Malthouse Road Conservation Area. The intention is therefore that a further proposal in respect of this Conservation Area will come forward separately at a later stage.
- 5.3. The special status of Conservation Areas within the planning system allows the Local Planning Authority to apply various policies and planning controls for the purpose of preserving or enhancing the character or appearance of the area.

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<sup>2</sup> The 2015 Local Plan identifies 6 ASLCs: Blackwater Lane, Pound Hill; Church Road, Pound Hill; Goffs Park Road, Southgate; Mount Close and Barnwood, Pound Hill; Milton Mount Avenue, Pound Hill; Rusper Road, Ifield. In line with the consultant evidence the emerging Local Plan proposes to add Albany Road/Spencers Road (West Green), Northgate Neighbourhood Centre and West Green Neighbourhood Centre to the list while removing Barnwood (Pound Hill). This is considered / determined through the Local Plan Review process.

<sup>3</sup> Updates in respect of Areas of Special Local Character and Historic Parks and Gardens are being taken forward through the review of the Local Plan, which is currently the key authority for identifying them. Updates in respect of Locally Listed Buildings are subject to the adoption of an updated Local Heritage List Supplementary Planning Document.

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- 5.4. For Crawley, the designation of 2 new Conservation Areas for Queens Square and the Broadway (Appendix A) and Gossops Green Neighbourhood Centre (Appendix B) will allow the Council as Planning Authority to:
- Remove / limit the number of permitted development rights; therefore requiring site owners / developers within the Conservation Areas to apply for planning permission for changes to their properties. This will allow the Local Planning Authority greater planning controls to address poor quality design and development proposals on sites within the Conservation Areas.
  - Exert greater planning controls over any proposals to demolish buildings within the Conservation Area;
  - Consider the impact of site development proposals on the significance of the area in the context of both Crawley Local Plan and national government planning policies;
  - Consider introducing new “Article 4” Directions in order to control changes which would not ordinarily require planning permission, such as the replacement of windows, doors and roof tiles.
- 5.5. Conservation Area designation may come to have additional implications in the context of potential future planning reforms.

## 6. Information & Analysis Supporting Recommendation

- 6.1. The recommendations are supported by Place Services, the heritage consultant, reports as follows:
- For the proposed Queens Square and The Broadway Conservation Area see [Crawley Heritage Assets Review Appendix C2 Areas of Special Local Character Assessment](#) (pp. 47-53)
  - For the proposed Gossops Green Neighbourhood Centre Conservation Area see [Crawley Heritage Assets Review Appendix C2 Areas of Special Local Character Assessment](#) (pp. 32-35)
  - For the boundary changes to the High Street and St Peter’s Conservation Areas see [Crawley Heritage Assets Review Appendix D Conservation Area Review](#)
- 6.2. Draft appraisals for the two new proposed Conservation Areas were also prepared and published as part of the public consultation (Appendix E), identifying the interest and assets of the areas in more detail.
- 6.3. Appendix F provides a more detailed analysis of the rationale for the new Conservation Areas and amendments to three of the existing Conservation Areas.

## 7. Implications

### Celebrating Crawley

- 7.1. The proposals would give additional parts of the borough nationally recognised status as heritage assets. The two proposed new Conservation Areas in particular focus on Crawley’s post-war New Town expansion and would help to emphasise and increase understanding of this heritage, which has been celebrated in Crawley’s bid for City status and in celebrations during 2022 for the 75<sup>th</sup> anniversary of the designation of the New Town.

### Economic

- 7.2. The proposal is expected to have positive economic effects overall. There is likely to be some additional costs for developers / site owners associated with development in the Conservation Areas (for example planning application fees; requirements for



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higher quality design and materials). It is, however, considered that these will be more than offset overall by the positive effects of a more distinctive and more carefully managed environment, which will ultimately be more attractive to residents, visitors and investors.

- 7.3. Where the Conservation Area designations affect important economic and social assets for the borough (i.e. most notably in the Town Centre, but also at Gossops Green Neighbourhood Centre) there will be a close co-ordination of the heritage strategies set out in the Conservation Area Statements with major regeneration projects and initiatives arising in these areas in order to maximise the social and economic benefits and the participation of a wide range of stakeholders.

## Environmental

- 7.4. The environmental impacts are considered to be positive overall. A wider extent of land within the borough will benefit from more careful control over development and more detailed development guidance and management proposals, leading to a better quality environment.
- 7.5. In encouraging the re-use and repurposing of existing elements of the built fabric, Conservation Area designation would promote the efficient use of the carbon embodied in buildings within the Conservation Areas, thereby helping to reduce the emissions associated with development activity and so contributing to the objectives set out in Crawley's Climate Emergency Declaration.
- 7.6. In order to protect the character and appearance of Conservation Areas, permitted development rights relating to the external cladding of dwellinghouses are automatically withdrawn, while rights relating to the installation of low/zero carbon energy technologies are limited so as to protect visually sensitive locations (for example walls, roof slopes and areas facing the public highway).
- 7.7. Existing rights to install solar photovoltaic panels on roofs would not be affected, but domestic air source heat pumps facing or positioned towards the public highway within Conservation Areas would usually require planning permission in order to consider their visual and amenity impact.

## Equalities

- 7.8. There are considered to be no negative impacts arising from these proposals on any group with a protected characteristic. The proposals would not introduce any additional restrictions on internal alterations made in order to improve the accessibility of buildings.

## Financial

- 7.9. The proposals involve a mixture of financial costs and benefits and are considered to be broadly neutral overall from a financial perspective.
- There would be some costs to the Council associated with fulfilling the statutory advertising requirements for the designation or alteration of a Conservation Area. Each designation (or amended boundary) must be advertised in the London Gazette as well as a local newspaper. It is estimated that the necessary eight advertisements in total would cost in the region of £4/5,000. This can be met from the existing Heritage Strategy Reserve budget.
  - The increased extent of land within Conservation Areas would result in some additional planning-related applications owing to the removal or limitation of existing permitted development rights. These would generate additional fee

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income for the authority, which is likely ultimately to offset the above advertising costs.

- The increased number/extent of Conservation Areas would provide additional future opportunities to bid for significant grant funding for heritage-related regeneration and improvements. One recent example of this was the Historic England [High Streets Heritage Action Zones](#) scheme which exclusively allocated £92 million across over 60 high streets, which are designated Conservation Areas in England.

## Legal

7.10. The key legal implications of Conservation Area designation are as follows:

- The Council would be under a duty to formulate and publish plans to ensure the preservation or enhancement of the Conservation area.
- Planning permission would need to be obtained from the Council for the demolition of any building in the area. It is a criminal offence to carry out demolition in a conservation area without planning permission.
- Special publicity would need to be given to planning applications for development in the conservation area.
- In carrying out any function under the planning acts (and, in particular, for determining applications for planning permission and listed building consent) the Council and the Secretary of State are required to take into account the desirability of preserving and enhancing the character and appearance of the area.
- Six weeks' notice would need to be given to the Council before works are carried out to any tree in the conservation area.
- The designation of a Conservation Area is a local land charge, i.e. a formally registered restriction on the use of land.

## Staff Resources

7.11. These are mainly required for the preparation of planning guidance documents such as Conservation Area Statements. This and other additional work demands arising from the above designations and amendments to Crawley's Conservation Areas would be met from within existing staff resources in the Council's Strategic Planning Team. The development of the Conservation Area Statements will involve some additional work including additional use of consultants, the costs of which can be offset by the extra income from planning fees arising from the planning applications which would subsequently be required in the newly designated Conservation Areas.

## 8. Background Papers

Queens Square and The Broadway Draft Conservation Area Appraisal

[https://crawley.gov.uk/sites/default/files/2021-02/Queens Square and The Broadway Draft Conservation Area Appraisal.pdf](https://crawley.gov.uk/sites/default/files/2021-02/Queens_Square_and_The_Broadway_Draft_Conservation_Area_Appraisal.pdf)

Queens Square and The Broadway Conservation Area Appraisal SA SEA Screening Report

[https://crawley.gov.uk/sites/default/files/2021-02/Queens Square and The Broadway CA SA SEA Screening Report Feb 2021.pdf](https://crawley.gov.uk/sites/default/files/2021-02/Queens_Square_and_The_Broadway_CA_SA_SEA_Screening_Report_Feb_2021.pdf)

Gossops Green Neighbourhood Centre Draft Conservation Area Appraisal

[https://crawley.gov.uk/sites/default/files/2021-02/Gossops Green Neighbourhood Centre Draft Conservation Area Appraisal.pdf](https://crawley.gov.uk/sites/default/files/2021-02/Gossops_Green_Neighbourhood_Centre_Draft_Conservation_Area_Appraisal.pdf)

# Agenda Item 6

Gossops Green Neighbourhood Centre Conservation Area Appraisal SA SEA  
Screening Report

[https://crawley.gov.uk/sites/default/files/2021-02/Gossops\\_Green\\_Neighbourhood\\_Centre\\_C\\_S\\_SEA\\_Screening\\_Report\\_Feb\\_2021.pdf](https://crawley.gov.uk/sites/default/files/2021-02/Gossops_Green_Neighbourhood_Centre_C_S_SEA_Screening_Report_Feb_2021.pdf)

Crawley Heritage Assets Review Appendix C1 Areas of Special Local Character  
Review

[https://crawley.gov.uk/sites/default/files/2021-01/Heritage\\_Assets\\_Review\\_Appendix\\_C1\\_Jan\\_21.pdf](https://crawley.gov.uk/sites/default/files/2021-01/Heritage_Assets_Review_Appendix_C1_Jan_21.pdf)

Crawley Heritage Assets Review Appendix C2 Areas of Special Local Character  
Assessment

[https://crawley.gov.uk/sites/default/files/2021-01/Heritage\\_Assets\\_Review\\_Appendix\\_C2\\_Jan\\_21.pdf](https://crawley.gov.uk/sites/default/files/2021-01/Heritage_Assets_Review_Appendix_C2_Jan_21.pdf)

Crawley Heritage Assets Review Appendix D Conservation Area Review

[https://crawley.gov.uk/sites/default/files/2021-01/Heritage\\_Assets\\_Review\\_Appendix\\_D\\_Jan\\_21.pdf](https://crawley.gov.uk/sites/default/files/2021-01/Heritage_Assets_Review_Appendix_D_Jan_21.pdf)

Planning (Listed Buildings and Conservation Areas) Act 1990

<https://www.legislation.gov.uk/ukpga/1990/9/contents>

Conservation Area Appraisal, Designation and Management  
Historic England Advice Note 1 (Second Edition)

<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

Report author and contact officer:

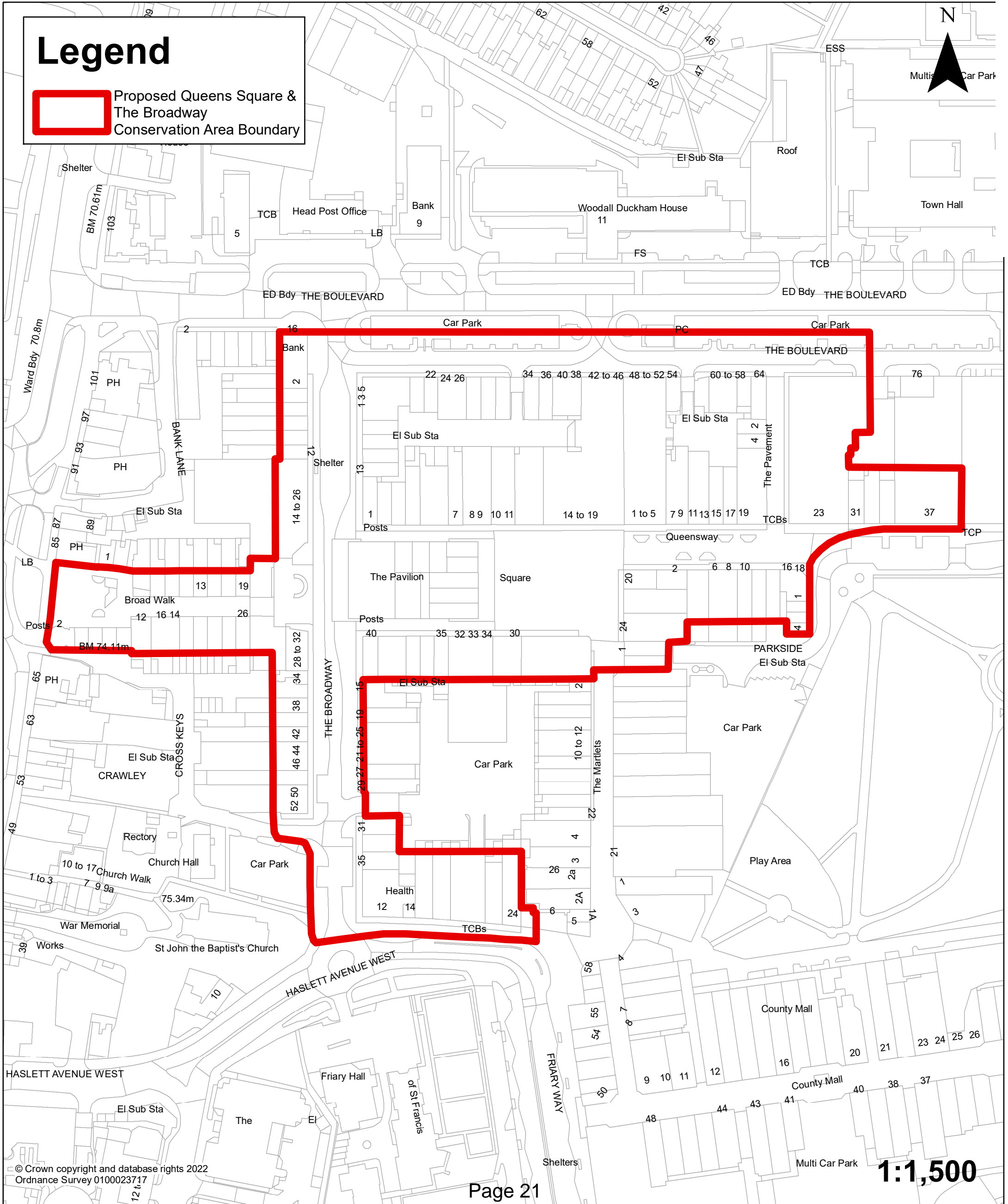
Ian Warren (Senior Planning Officer)

[ian.warren@crawley.gov.uk](mailto:ian.warren@crawley.gov.uk)

01293 438644

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# Appendix A - Queens Square and The Broadway Proposed Conservation Area Boundary

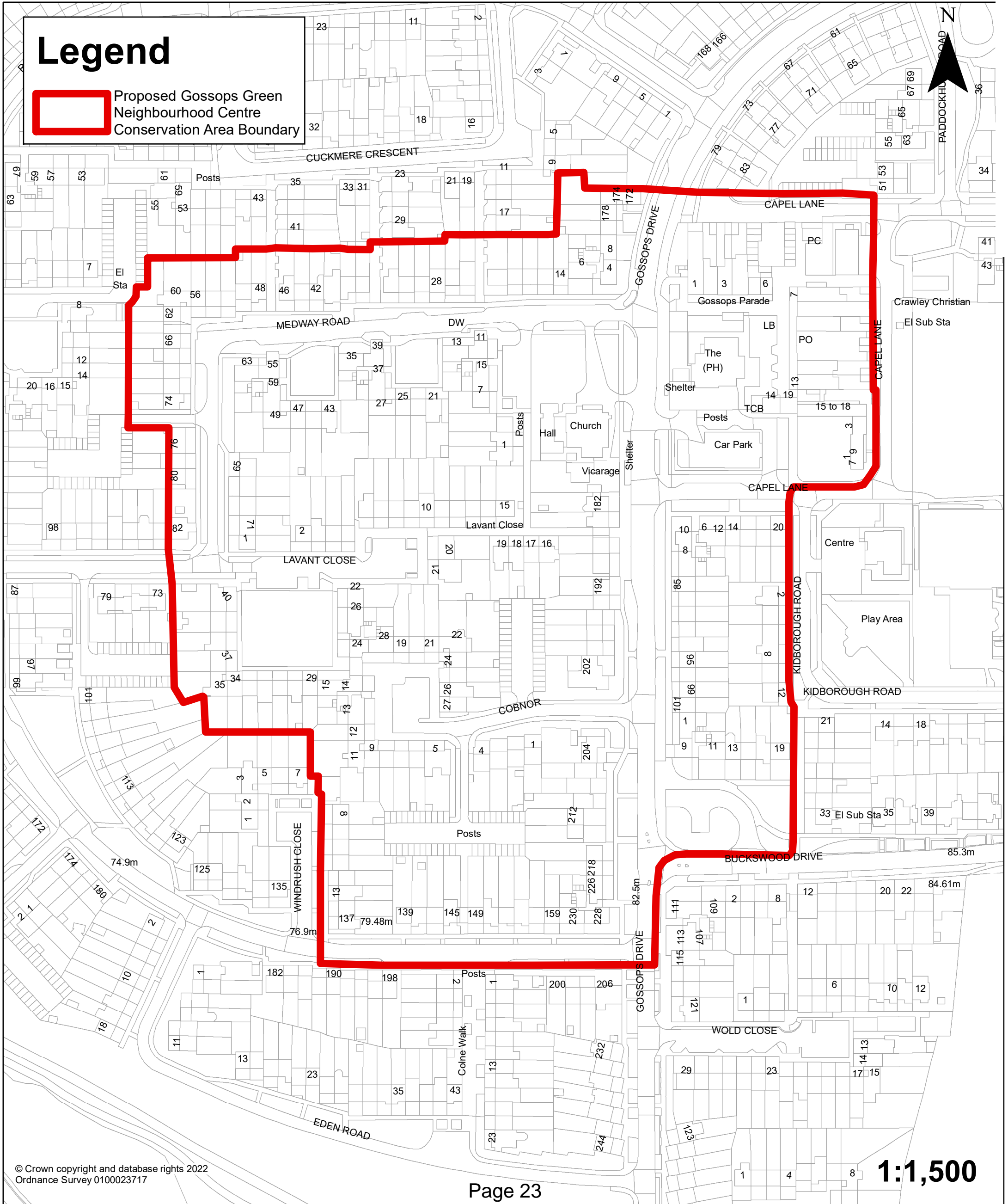


**Legend**

Proposed Queens Square & The Broadway Conservation Area Boundary

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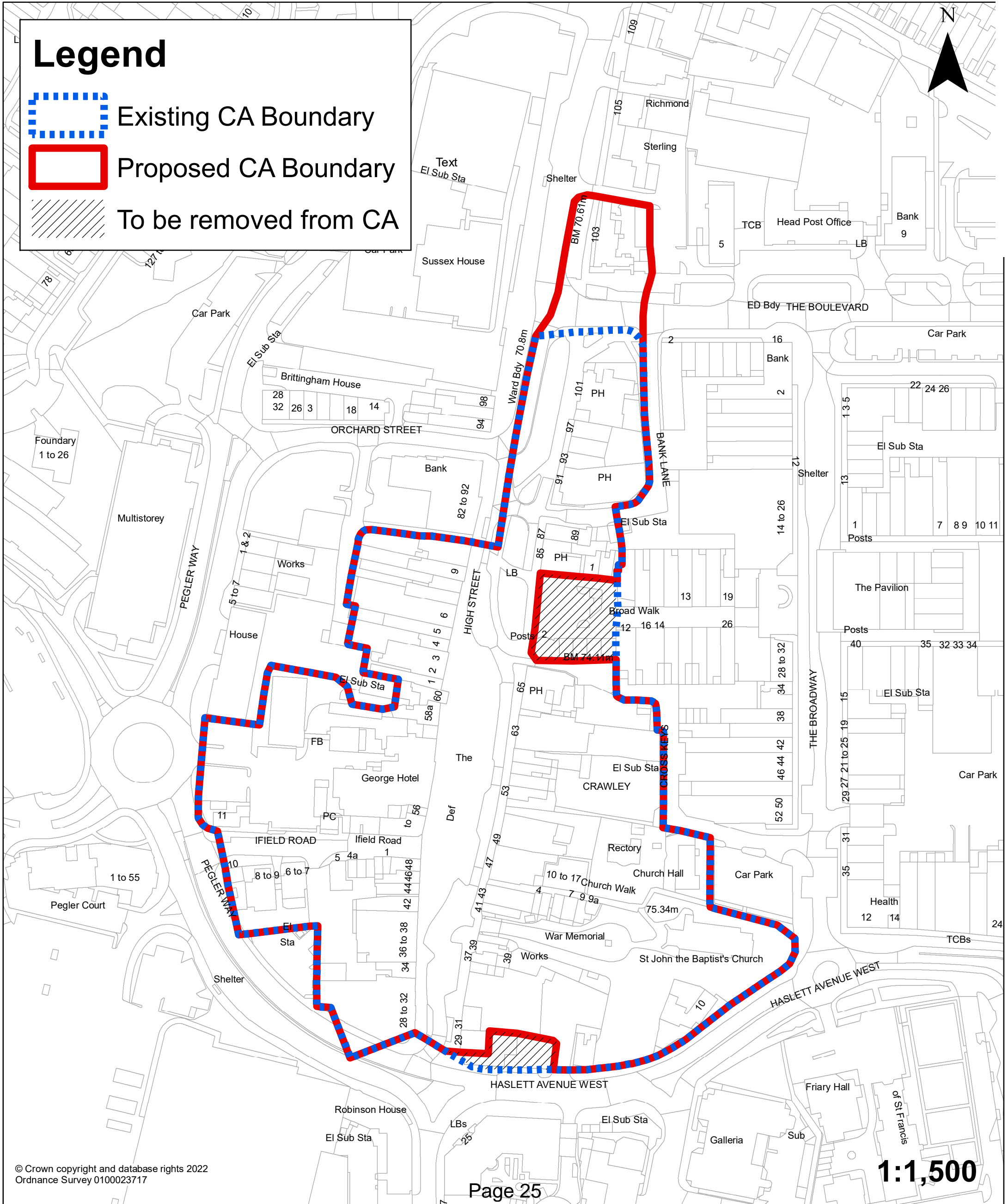
# Appendix B - Gossops Green Neighbourhood Centre Proposed Conservation Area Boundary



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# Appendix C - High Street Proposed Conservation Area Boundary





## Legend

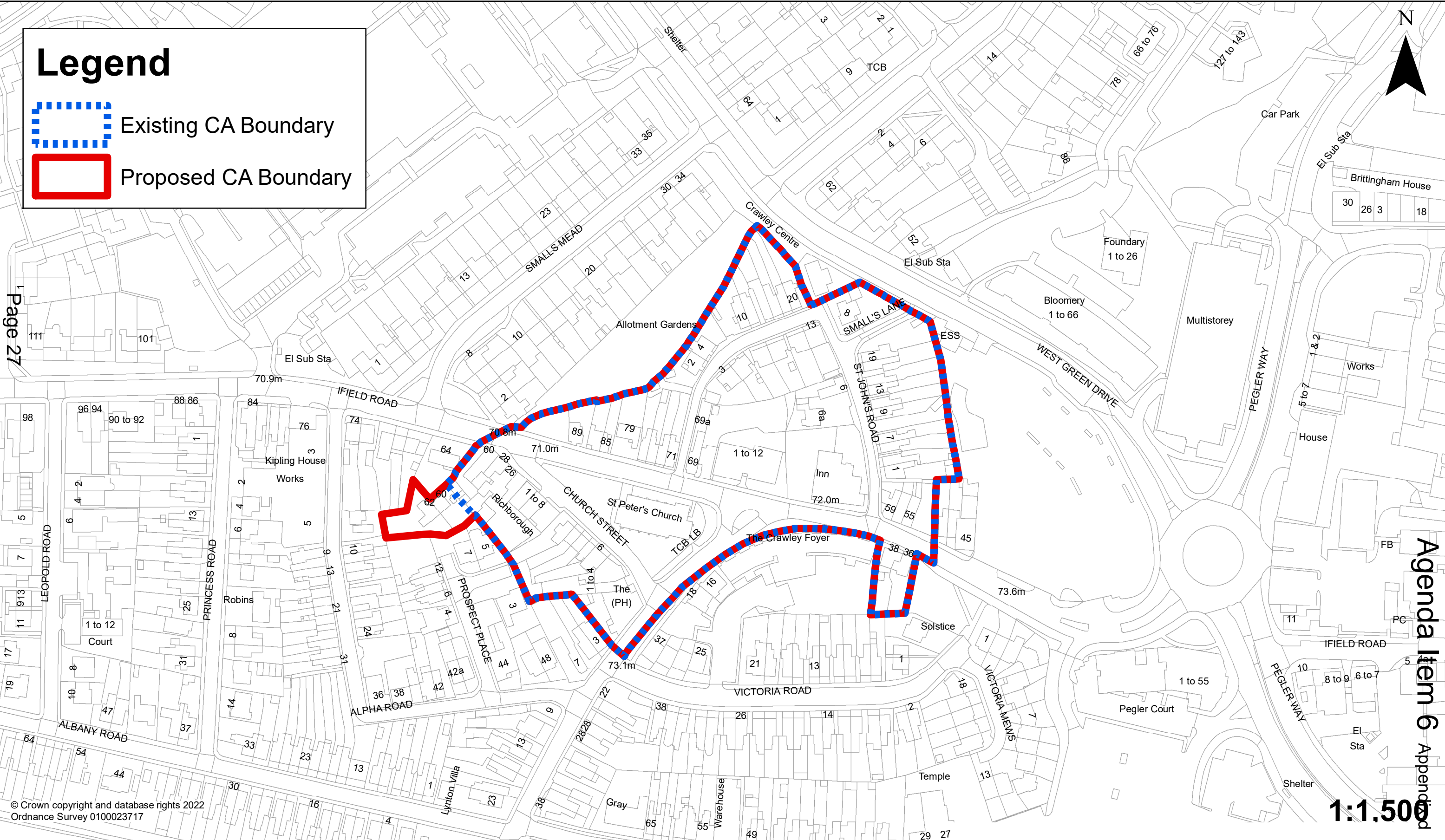
- Existing CA Boundary
- Proposed CA Boundary
- To be removed from CA

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# Appendix D - St Peter's Proposed Conservation Area Boundary

**Legend**

-  Existing CA Boundary
-  Proposed CA Boundary



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**APPENDIX E: CONSULTATION REPRESENTATIONS REGARDING RECOMMENDED CONSERVATION AREA CHANGES AND RESPONSES FROM PLACE SERVICES & CBC**

<b>Gossops Green Neighbourhood Centre Conservation Area (proposed new CA)</b>					
<b>Ref No.</b>	<b>Respondent</b>	<b>Comments</b>	<b>Place Services response</b>	<b>CBC response</b>	<b>Recommendation</b>
15	Historic England	<p>Thank you for consulting us on the draft conservation area appraisals for Gossops Green and Queen Square, as well as the consultation draft for locally listed buildings. We do not wish to offer detailed comments on this occasion but are pleased that your Council have undertaken this work which will feed into future planning decisions locally. We are also pleased that Historic England's Advice Notes 1 and 7 on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage have been used as a basis for the proposals.</p> <p>We think that it is positive that the Heritage Asset Review includes management recommendations, as this will enable the documents to be of most use in the planning process. We are pleased that this approach is intended for the conservation area appraisals subject to the outcome of this consultation.</p> <p>We note that Advice Note 7 states that locally listed buildings and areas lists should be easily accessible and published online and on the Historic Environment Record. It is implied within appendix A1 Non-Designated Heritage Asset Review that this would be undertaken, but we would encourage you to make this more explicit in the document. We also note that while it is clear the draft conservation area appraisals use Advice Note 1, this is not explicitly stated, and we suggest that this is added within the methodology.</p> <p>It is not necessary for us to be consulted on these documents again, unless there are changes which have an impact on the historic environment, and especially designated heritage assets. However, if you would like detailed advice from us, please contact us to explain your request.</p>	<p>Comments from HE generally supportive and recognise that Historic England's Advice Notes 1 and 7 on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage have been used as a basis for the proposals. We note HE's comments regarding Advice Note 7 and the publishing of locally listed buildings and areas lists online.</p>	<p>We note that the Historic England comments are generally supportive of the approach taken.</p>	<p>Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)</p>
16	Ifield Village Conservation Area Advisory Committee	<p>We would support one of the New Town neighbourhoods being designated as a Conservation Area. The Gossops Green neighbourhood is a suitable one for the reasons outlined in the report. It is also visually an interesting area because it is on a hill with longer distant views than many areas of Crawley.</p>	<p>Note comments are supportive.</p>	<p>We note support for the proposed designation.</p>	<p>Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)</p>
19	Member of the public 10	<p>Proper planning and thought should go into any new conservation areas so that they are a success. Unfortunately recent conservation areas have been poorly thought out. Example being Crawters Brook which has a dipping platform but no water for children to dip into. Ridiculous and embarrassing.</p>	<p>Historic England's Advice Notes 1 and 7 on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage have been used as a basis for the proposals. Conservation Area management recommendations have been made in the appraisal documents. Place Services understand that Crawters Brook is a nature conservation area, not an area designated for its historic or architectural interest.</p>	<p>We understand the importance of properly thinking through the proposals. In due course we propose to consult upon and adopt a Conservation Area Statement for the area, including design guidance and management proposals.</p> <p>It is, however, important to emphasise that this proposal is not about creating a new park/reserve or similar as at Crawter's Brook. Instead the proposal is to designate the land within the identified boundary as a Conservation Area in order to preserve and enhance its existing special character.</p>	<p>Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)</p>
21	Member of the public 12	<p>I am in support - see introductory statements. (I enthusiastically support all the comments I have read that have been submitted in favour of preserving as heritage of as much as is possible to what was planned for Crawley by the new towns commission...and manifested... by them at the time. I also support to all comments to that preserve buildings and spaces that pre-date the new towns commission when it came into being established. The buildings and spaces that</p>	<p>Note comments are supportive.</p>	<p>We note support for the proposed designation.</p> <p>The parades at Furnace Green and Tilgate and Worth Park do not fall within the scope of the</p>	<p>Designation of Gossops Green Neighbourhood Centre Conservation Area</p>



		predate their efforts provide some context and history too. Such as peace gardens and parks and open spaces that allow more to reconnect to nature and history. Thus my comments to all buildings would be..." Preserve so as to allow more to reconnect to nature and history or this new and old town.") I would include Furnace Green local shopping centre, Tilgate and the Worth Park as well as the residential flats above them.		Conservation Area proposals. Other heritage designations are more relevant to them ('Locally Listed Building' status in respect of the parades; 'Historic Park and Garden' status in respect of Worth Park.	recommended (see map)
23	Member of the public 14	I don't consider that the buildings in this area are of sufficient architectural interest to warrant a designation as a Conservation Area.	Place Services made the recommendation that Gossops Green should be assessed for potential conservation area designation as it was found to be of special architectural and historic interest. It has architectural and historical value as the final stage of New Town development undertaken by Crawley Development Corporation, with a planned layout and landmark buildings. The architectural value of the area was found to be medium to high with a cohesive character and details typical of the post-war period, such as canopies, mosaic tiles and decorative brickwork. As such it was considered to be of greater special interest than an ASLC and potentially worthy of Conservation Area designation.	The Place Services assessment of the area found that it had medium to high architectural value together with historic value as an example of Crawley's New Town development and part of the original masterplan for the town. These findings are expanded on in the assessment and in the draft Conservation Area Appraisal document. Two buildings (the parade and church) are already Locally Listed. Earlier assessments have also noted the architectural quality of the area, including the 2010 Alan Baxter review.	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
29	Member of the public 2	I can't really comment as not familiar enough with it and its merits. Not familiar with this area so feel I cannot comment.	No response required	No response required	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
32	Member of the public 22	Including Soft landscaping and connection to existing wild life corridors. Policy related to people movement within area re mobility impaired, bikes, electric scooters etc. + Car Parking cycle routes and relationship to town wide systems.  More details required along with public discussion.  No definite plan submitted.	Comments noted	We note the comments: it is, however, important to emphasise that we are not proposing to redesign the landscaping or rights of way in the area or part of it, but instead to preserve and enhance its existing character.	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
34	Member of the public 24	Great to see the history of the New Town/City master plan preserved.	Note comments are supportive.	We note support for the proposed designation.	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
38	Member of the public 4	Why would you want to make an area that are essentially ex council house properties a conservation area. These houses are not unique nor have any cultural significance. It's madness to consider this area as meeting the criteria for a conservation area.	The methodology and processes that led to the recommendation for potential Conservation Area Designation for Gossops Green was set out in Appendix C. The assessment process adhered to Historic England's guidance document Advice Notes 1 and 7	The Place Services assessment of the area found that it had medium to high architectural value together with historic value as an example of Crawley's New Town development and part of the original masterplan for the town. These findings are expanded on in the assessment	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)

			on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage.	and in the draft Conservation Area Appraisal document. Two buildings (the parade and church) are already Locally Listed. Earlier assessments have also noted the architectural quality of the area, including the 2010 Alan Baxter review.	
41	Member of the public 7	No justification for inclusion. Not appropriate.	No comments.	The Place Services assessment of the area found that it had medium to high architectural value together with historic value as an example of Crawley's New Town development and part of the original masterplan for the town. These findings are expanded on in the assessment and in the draft Conservation Area Appraisal document. Two buildings (the parade and church) are already Locally Listed. Earlier assessments have also noted the architectural quality of the area, including the 2010 Alan Baxter review.	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
44	Member of the public 9	I really thought this was a joke. I recently moved back to Gossops Green after a thirty year interval living in furnace Green and I was shocked that what had been a pleasant neighbourhood parade had become a squalid place of run down takeaways and general decrepitude and decay. It is depressing and not a good advert for Crawley new town. It used to have lovely neighbourhood butchers and greengrocers and other shops, your policies and rents have ruined this area and it really isn't worth preserving in it's present configuration. If I could have bought my present home in Furnace green I would have done it has a much nicer neighbourhood parade. I have lived and worked in Crawley since the 1970's and think the town has a lot to offer but council policies (of both political parties) seem determined to turn the shopping and neighbourhood areas of the town into rundown unloved spaces and conserving your worst efforts is not going to help. Spend money on sprucing up the front of house and the litter and rubbish laden rears of these centres make them look appealing then think about the conservation of the spaces.	According to National Planning Policy, the local Authority is obliged to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy will take into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation along with the the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. In addition the Local Authority will consider the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place. The neglected state of the area can therefore be improved through Conservation Area Designation.	We support the view of Place Services that issues of physical deterioration are not valid reasons to proceed with the designation of a Conservation Area where the underlying qualities justify such a designation. Good Practice Guidelines for Conservation Area designation published by the 20 <sup>th</sup> Century Society state: <i>'Try not to let poor maintenance of the building or surrounding public realm obscure the contribution made by C20th building(s). Recognition of the building's value can encourage improvements in maintenance.'</i>	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
<b>Queens Square and The Broadway Conservation Area (proposed new CA)</b>					
<b>Ref No.</b>	<b>Respondent</b>	<b>Comments</b>	<b>Place Services response</b>	<b>CBC response</b>	<b>Recommendation</b>
7	Shivshakti Properties Limited	We own the Freehold of property at 17 Queensway, Crawley, West Sussex RH10 1EB.	A conservation area designation will not have an impact on	We note and appreciate the response. However, we agree with	

		<p>We are active property investors. We have recently received a letter from you dated 26th, February 2021 informing us of your proposals to make changes to Crawley's Conservation Areas and Locally Listed Buildings which will have an influence on future planning decisions.</p> <p>We strongly oppose to the changes you are planning to make in designated areas mentioned in your letter which will no doubt affect us. We are concerned that the proposed scheme would have impact on our future ability to carry out any redevelopment. This will have detrimental effect on our property investment business and will be economically unviable.</p> <p>I would be grateful if you could give consideration to our objection to the proposed scheme reconsider your proposals.</p>	<p>redevelopment or the viability of investment in property. It will require developers and architects to consider the historic and architectural special interest of the area and ensure that development schemes are sympathetically designed, high in quality and appropriate in terms of scale, appearance and materials. Studies show that Conservation Area status can lead to an increase in the economic vitality of an area and maintain and even improve property values.</p>	<p>Place Services' view that Conservation Area designation can improve economic vitality in an area and encourage investment. It can also bring social and cultural benefits by helping to highlight and celebrate what is distinctive about an area. The intention is not to prevent change but to ensure that it occurs in a way which respects the character of the area.</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>
11	Central Crawley Conservation Area Advisory Committee	<p>I have now read the ASLC assessment for the town centre and perhaps considering it for a conservation area status is merited. I think a site visit would be helpful when it is legal to make one!</p> <p>One part of the area recommended by Place is not strictly new town. The area in question is the retail units from and including the St Catherine's shop in the Broadway and along Haslett Av. W to the Martlets. Originally this area was a public garden but was built over in the 1980s with the current buildings. Hence the different style materials, concrete vice brick.</p>	<p>The further assessment of the boundary will be carried out as a part of any future appraisal document.</p>	<p>We appreciate the response and note the support for the designation in principle.</p> <p>In respect of Cross Keys House (31-35 The Broadway &amp; 12-24 Haslett Avenue West): this building in fact appears to date from the 1970s and while its brutalist style differs from the style of the earlier 1950s buildings, we consider that its architectural quality, modern style, and relationship with the earlier buildings in terms of scale (and the inclusion of a canopy) contribute to the 'New Town' character of the area and justify its inclusion within the proposed Conservation Area.</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>
13	DMH Stallard & Heritage Collective UK on behalf of Building Owner (14-26 The Broadway)	<p>DMH Stallard Letter:</p> <p>In response to the consultation on the above matters, please find attached a detailed response setting out STRONG OBJECTIONS to the local list nomination of the above property and the proposed Queen's Square and The Broadway Conservation Area which has been prepared by Heritage Collective on behalf of Balfe Limited. Balfe Limited being the current owner of the Wilko's store building at Nos. 14-26 The Broadway.</p> <p>....</p> <p>With regard to the proposed Conservation Area the Place Services Non-Designated Heritage Asset Review undertaken in December 2020, concluded that:</p> <p><i>"The designation of the existing six Areas of Special Local Character is still considered appropriate in light of the proposed new approach and criteria. Some boundary amendments have been recommended to better reflect the special character of the areas. These areas provide a representation of the unique character and local distinctiveness of Crawley and permit a greater understanding of the variety and breadth in the Borough's heritage. The suggested criteria are broader and more inclusive than the existing but remain</i></p>	<p>The initial assessment of Crawley New Town Centre (Appendix C1) looked at the possibility of designating part of the New Town Centre as an Area of Special Local Character (ASLC). The boundary for this assessment was large, including almost all of the buildings on the southern side of The Boulevard, and the entirety of The roadway</p>	<p>We note and appreciate the response: however it is important that the decision is properly informed by an understanding of national policy, best practice, and the available evidence. This includes a correct understanding of the evidence provided by Place Services.</p> <p>As explained in the suite of evidence provided by Place Services and reiterated in their subsequent response, their Review and Assessment of this area proceeded sequentially. Firstly at the 'Review' stage a larger area was surveyed as a potential Area of Special Local Character and was found not to merit that status. A smaller area was then surveyed at the 'Assessment' stage, and this</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>



*selective to ensure the level of special local quality warranting the designation. The application of these broader criteria could potentially allow for the inclusion of further Areas of Special Local Character which may previously have been overlooked, including New Town neighbourhoods and more densely developed residential areas which are integral elements of the Borough's heritage. The suggested criteria align with criteria recommended for the designation of Crawley's other local heritage assets, including buildings and parks and gardens. This allows for a comprehensive and transparent approach to the designation of local heritage assets."*

It is in the context of the above conclusion that the recommendation not to add Queens Square and The Broadway to the Local Heritage List of Areas of Special Local Character was made. Accordingly, we submit that the proposed Conservation Area lacks special interest for the reasons provided above and that its designation would devalue the concept of conservation, contrary to the purposes of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the objectives of the NPPF.

and Queensway. This large area was found to not possess enough architectural or historic interest to justify the creation of an ASLC due to the amount of modern development which has occurred, diluting the original design and architectural interest of the area. It was recommended that the New Town Centre area was re-assessed with a more compact boundary, as there are buildings of local interest within the New Town and other structures which retain original detailing. These elements create a sense of the original appearance of the New Town Centre, however, the character was not coherent nor easily discernible within the larger boundary of the area which was used for the initial ASLC assessment.

A subsequent assessment was undertaken (Appendix C2), which looked at the suitability of creating an ASLC within the New Town Centre again, this time with a reduced boundary. It was found that with this revised boundary there was a more legible townscape character, and the impression of the New Town Centre's original appearance was more tangible. It was concluded that it was not appropriate to designate the revised boundary as an ASLC as it possessed greater significance than a non-designated heritage asset. It was felt that there should be further assessment of the area as a potential conservation area due to its special architectural and historic interest. Additionally, the threats to the New Town Centre could not be managed or addressed as effectively if it were to be designated as an ASLC, as this would not bring with it additional planning controls.

We maintain that the area assessed with the revised boundary does have special interest and a distinct character worthy of preservation and

was found to have sufficient architectural and historic interest to justify Conservation Area status. The conclusion of the 'Review' stage is therefore of limited relevance to the proposals, and taken in isolation does not fairly reflect the Place Services findings in relation to the proposed Conservation Area.

In addition to the above, the proposal for the Local Listing and Conservation Area status, would limit the prospects of town centre renewal and regeneration which has commenced successfully in Crawley Town Centre over recent years. The thrust of national planning policy is to see town centres/sustainable locations developed to their full potential. Locally the Crawley Local Plan sees the potential for further development within the Town Centre and with the increasing residential population the establishment of a Town centre 'neighbourhood'. The establishment of a Conservation Area/Local Listing will severely limit the opportunities for building above the existing buildings or the regeneration of sites (as has been successfully achieved recently on the south east side of The Broadway (29-15) given that schemes would need to meet the 'desirability of sustaining and enhancing the significance of heritage assets' test.

For the reasons set out above and in more detail within the attached assessment, we object strongly to the proposed local list nomination of the

enhancement. It is felt that conservation area status would be of most benefit to the New Town Centre. However, the alternative of creating an ASLC within the New Town Centre (with the boundary of the Appendix C2 recommendation) is an alternative as this would still acknowledge its architectural and historic value.

Regarding the inclusion of buildings within the New Town Centre on the Council's Local Heritage List, they are considered to meet the criteria for designation and the recognition of their local interest only strengthens the argument that the Appendix C2 area boundary has architectural and historic value worthy of designation as either an ASLC or a conservation area. The two designations (buildings included on the Local Heritage List and the ASLC or conservation area) would enhance each other. Also, whilst local listing without conservation area designation would help protect the individual buildings, it would fail to recognise the urban design and masterplanning of the 1950s New Town Centre, as well as the overall character of the area, which would be acknowledged and celebrated through conservation area designation.

We agree that town centre renewal and regeneration are key objectives supported by national and local planning policy. However we do not believe that heritage designation is intrinsically in conflict with these aims, or with 'change' per se. Conservation Areas are frequently present in successful town and city centre areas (as in the High Street), and they have played a key role in a number of successful urban regeneration programmes across the UK. We also consider that defining, celebrating and reinforcing what is distinctive about Crawley as a place is an important element of

above property and the proposed Queen’s Square and The Broadway Conservation Area.

Heritage Collective UK Report:

1. This Objection Response to the local list nomination of the above property within the proposed Queen’s Square and The Broadway Conservation Area (also objected) has been prepared by Heritage Collective on behalf of Balfe Limited. Balfe Limited is the current owner of the Wilko’s store building at Nos. 14-26 The Broadway, henceforth referred to as the ‘Site’ (Figure 1).
2. This objection provides an overview of the Site’s historic development and heritage significance followed by an assessment against the adopted criteria for determining eligibility for local listing within the Borough of Crawley in line with the latest published National Guidance (Historic England Advice Note 7, 2nd Edition – January 2021).
3. Alongside an objection to the proposed local listing, this response also provides an objection to the proposed conservation area designation at Queen’s Square and The Broadway as outlined in the Council’s letter of 1st March 2021 (Appended), in line with National Guidance (Historic England Advice Note 1, 2nd Edition – February 2019).

Background

4. The Site contains no heritage assets, designated or otherwise and the existing building dates from the mid-late 1950s. It is a typical building for its date and location within the new commercial centre of Crawley. This was largely constructed between 1954 and 1958 following the designation of Crawley as a New Town in 1947. As part of a review of the Borough’s heritage assets undertaken in 2020, the Council is now seeking views from the public and interested parties on the following proposals:
  - The creation of two new Conservation Areas at Queens Square and The Broadway and Gossops Green Neighbourhood Centre;
  - Changes to the boundaries of the Brighton Road, High Street, and St Peter’s Conservation Areas.
5. In addition, the Council are proposing to make changes to the list of Locally Listed Buildings, as part of an updated Local Heritage List as follows:
  - Inclusion of around 60 additional buildings;
  - Removal of two buildings currently on the list.
6. Nos. 14-26 The Broadway is identified as one of the 60 additional buildings being considered for inclusion on the Local Heritage List. Somewhat anomalously only the front part of the building is situated within the proposed new conservation area at Queens Square and The Broadway (Figure 2).
7. This consultation response provides substantive reasons why the building should not be included on the Local Heritage List and why Queens Square and The Broadway should not be designated as a conservation area. This note of Objection has been informed by desk based and archival research and a full site visit undertaken on 30th April 2020.

....

making the town centre an attractive location for investment.

		<p>Queens Square and The Broadway, Conservation Area</p> <p>34. A summary of the area’s significance and character is provided in the Non-Designated Heritage Asset Review prepared for Crawley Borough Council by place Services in December 2020 (pp. 52-59 – see Appendix 1).</p> <p>35. The proposed conservation area at Queens Square and The Broadway is objected on the following grounds:</p> <ul style="list-style-type: none"> <li>- The significance of Crawley’s New Town is as an example of post war architecture, following the town’s important designation as a New Town in 1947. Crawley was amongst the first of these towns to be designated and its urban design is significant as an example of the ethos and design principles which steered design during that period. However, the original masterplan by Sir Anthony Minoprio was only partially realised and development in the past thirty years has undermined the architectural intent which guided the initial development of the area.</li> <li>- The Boulevard, at the northern edge of the area, is currently being redeveloped, including the demolition of the Town Hall and its replacement with a new, reimagined civic centre. As a key component of the original New Town’s design, the loss of this building and other 1950s-60s buildings is detrimental to the significance of the area, reducing its number of postwar buildings, cohesion and group value. The legitimate exclusion of The Boulevard from the proposed designation because of these changes, further undermines the case for conservation area status for only part of the New Town. The proposed area, though closer in execution to the original concept and better preserved, forms only part of the original masterplan. As a potential conservation area, it is inherently inchoate, fragmentary and too much altered to justify its designation.</li> <li>- The architectural value of the area is limited due to the erosion of the original layout and the fact that the original masterplan was not entirely realised. Some original features remain within the area, but these are</li> </ul>	<p>In their representation the HCUK group (ref 13.1) cite the reason the area lacks sufficient architectural or historic interest is because “ ..the original masterplan by Sir Anthony Minoprio was only partially realised and development in the past thirty years has undermined the architectural intent which guided the initial development of the area”. Place Services found in their assessment of the area that it has a strong townscape character, including areas which are largely authentic and that with careful management, the area and its character could be enhanced and preserved. The area proposed for Conservation Area Designation was reduced in size from the area assessed for suitability as an ASLC, precisely because this removed the zones where the original character had been most diluted by modern development. The area proposed for Conservation Area status provides sufficient evidence of the intended block plan, arrangement, scale and cohesive character of the original development and possessed higher level of significance than a non-designated heritage asset (ASLC). The document from HCUK provides no compelling reasons why the area should remain undesignated.</p>	<p>The summary referred to relates to a larger area containing much development of a more recent date. The subsequent ‘Areas of Special Local Character Assessment’ focuses specifically on the extent of the proposed Conservation Area, and concludes that Conservation Area status is warranted.</p> <p>The scheme which was implemented, was by A.G. Sheppard Fidler, chief architect of Crawley Development Corporation, and was published in 1952. It formed a coherent scheme which is considered to be of historic interest in its own right, and much of it remains intact and legible, notwithstanding subsequent changes.</p> <p>The northern side of the Boulevard was always distinct from the area to the south, being intended a focus for large offices and civic buildings, set back within larger individual plots, as distinct from the terrace style of building found in the shopping area to the south. As such the impact of changes north of the Boulevard on the cohesion and legibility of the proposed Conservation Area can be overstated. In any case the same objection might be raised against other established Conservation Areas whose setting has undergone more significant change.</p> <p>We consider that the masterplan which was implemented should be assessed as a coherent plan in its own right, rather than being</p>	
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		<p>limited and often in a poor state of repair; the mosaic tiles which feature throughout the New Town could benefit from refurbishment. Similarly, the changes to the layout, partially infilling Queen Square and addition of the County Mall, south of the proposed conservation area, diminish the group value of the 1950s-60s buildings.</p> <p>- Modern infill has undermined its character and original layout. The quality of the surviving original architecture is attractive in places but lacks cohesion due to intervening modern development.</p> <p>- The New Town has some communal value for residents, many of whom will remember the early phases of the New Town development. Queen Square and the Memorial Gardens (south east of the area) remain popular meeting and recreation spaces. However, the communal value is not considered to justify the designation of this part of the New Town Centre as a conservation area.</p> <p>36. The recent Heritage Assets Review undertaken by Place Services for Crawley Borough Council (December 2020) concluded that the new town centre comprising The Broadway and Queen’s Square should not be designated as an Area of Special Local Character (ASLC), let alone a formally designated conservation area that would be subject to paragraphs 193-196 of the NPPF. This conclusion is considered to be sound and fully aligned with best practice guidance published in HEAN 1 and HEAN 7 and their respective selection criteria.</p> <p>37. In coming to its conclusion, the Council must be mindful of the purpose of conservation area designation under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as the prime objective of the NPPF which is to promote and achieve sustainable development. To this end the NPPF states in Paragraph 186:</p> <p><i>“When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.”</i></p> <p>38. Besides the recommendation made by Place Services not to identify the New Town Centre / Queens Square and The Broadway as an Area of Special Local Character (in other words a non-designated heritage asset), it should be noted that Crawley New Town is not included on a list of potential 20th century conservation areas identified by the</p>	<p>[See comments in response to the DMH Stallard letter above]</p>	<p>assumed to be inferior because it replaced an earlier plan.</p> <p>State of repair is not a valid criterion with regard to Conservation Area designation. Designation can help support improvements to repair/maintenance.</p> <p>As noted by Place Services, the original scheme implemented within the area is largely intact and still clearly legible. It retains a high degree of cohesion notwithstanding the change which has occurred, which is comparable to what you would find in other town centre Conservation Areas.</p> <p>We agree that this area has significant communal value. Queens Square is an important space for events and socialising, and photographs used to illustrate news stories about Crawley typically focus on this area.</p> <p>We consider that the recommendations are fully in line with NPPF para 186. We consider that Place Services have been thorough and rigorous in applying national policy and best practice guidance. They did not support suggested Conservation Area extensions elsewhere (e.g. Hazelwick Road) precisely because these areas were not thought to justify the designation. We are confident that their recommendations are based on a rigorous and consistent approach.</p> <p>See above and Place Services own response for clarification on they did or did not recommend. Concerning the 2017 report by the</p>	
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		<p>Twentieth Century Society in a recent study supported and promoted by Historic England; Conservation Areas Project - Potential Conservation Areas Scoping Report, December 2017.</p> <p>39. In a similar vein it should also be pointed out that an audit of existing 20th century themed conservation areas undertaken by the Twentieth Century Society demonstrates that Crawley Borough is already well represented by such heritage assets, i.e., areas of special architectural or historic interest that are designated as conservation areas because of the special character and appearance of their 20th century layout and architecture. These include; Dyers Almshouses, Southgate Neighbourhood Centre, Sunnymead Flats and Forestfield and Shrublands. Indeed, Crawley Borough Council is one of the leading authorities in the country for its promotion and preservation of noteworthy examples of 20th century development that are considered significant because of their heritage interest, meriting consideration in planning decisions. These areas are of special interest, whereas the New Town Centre lacks the cohesion and integrity of these established designated heritage assets.</p> <p>40. In addition to these designated conservation areas there are six Areas of Special Local Character within the Borough, several of which incorporate 20th century elements of the urban fabric and associated built form. These six areas are:</p> <ul style="list-style-type: none"> <li>• Blackwater Lane</li> <li>• Church Road</li> <li>• Goffs Park Road</li> <li>• Milton Mount Avenue</li> <li>• Mount Close and Barn Wood</li> <li>• Rusper Road</li> </ul> <p>41. The Place Services Non-Designated Heritage Asset Review undertaken in December 2020, concluded that:</p> <p><i>“The designation of the existing six Areas of Special Local Character is still considered appropriate in light of the proposed new approach and criteria. Some boundary amendments have been recommended to better reflect the special character of the areas. These areas provide a representation of the unique character and local distinctiveness of Crawley and permit a greater understanding of the variety and breadth in the Borough’s heritage. The suggested criteria are broader and more inclusive than the existing but remain selective to ensure the level of special local quality warranting the designation. The application of these broader criteria could potentially allow for the inclusion of further Areas of Special Local Character which may previously have been overlooked, including New Town neighbourhoods and more densely developed residential areas which are integral elements of the Borough’s heritage.</i>”</p>		<p>Twentieth Century Society referred to, this states:  <i>‘...the project coverage could not be comprehensive given the project’s timescale and resources. The list is not at all definitive and there are doubtless many other possible twentieth century candidates for conservation area designation.’</i></p> <p>The number of 20<sup>th</sup> century Conservation Areas (or Areas of Special Local Character) already existing in the borough is not directly relevant to the consideration of whether the proposed new area is an area of special architectural or historic interest. It should be considered in its own right. It is generally true that Crawley is rich in post-war architecture. The proposed Conservation Area is considered to exemplify this in a town centre context, whereas the other areas are residential estates or neighbourhood parades.</p>	
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<p>14</p>	<p>DMH Stallard on behalf of the Town Centre Business Improvement District</p>	<p><b>Objection Response to the local list nomination of most suggested buildings within the Town Centre (Northgate) and the proposed Queen’s Square and The Broadway Conservation Area</b></p> <p><b>Submitted by Crawley Town Centre BID (CTCBID)</b></p> <p>The CTCBID will make further representations in respect of the Local Plan, by the revised deadline of 30th April 2021.</p> <p>This response is made in relation to the consultations on the formulation of a local list of heritage assets and the proposed Queen’s Square and The Broadway Conservation Area.</p> <p><u>Queens Square and The Broadway, Conservation Area</u></p> <p>A summary of the area’s significance and character is provided in the Non-Designated Heritage Asset Review prepared for Crawley Borough Council by place Services in December 2020.</p> <p>The proposed Conservation Area at Queens Square and The Broadway is objected to on the following grounds:</p> <p>o The significance of Crawley’s New Town is as an example of post war architecture, following the town’s important designation as a New Town in 1947. However, the original masterplan by Sir Anthony Minoprio was only partially realised and development in the past thirty years has undermined the architectural intent which guided the initial development of the area.</p>		<p>The scheme which was implemented, was by A.G. Sheppard Fidler, chief architect of Crawley Development Corporation, and was published in 1952. It formed a coherent scheme which is considered to be of historic interest in its own right, and much of it remains intact and legible, notwithstanding subsequent changes.</p>	<p>Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)</p>

o The Boulevard, at the northern edge of the area, is currently being significantly redeveloped. The exclusion of The Boulevard from the proposed designation because of these changes, undermines the case for Conservation Area status for only part of the New Town. The proposed area, though closer in execution to the original concept and better preserved, forms only part of the original masterplan. As a potential conservation area, it is too much altered to justify designation.

o The architectural value of the area is limited due to the erosion of the original layout and the fact that the original masterplan was not entirely realised. Similarly, the changes to the layout, partially infilling Queen Square with the Pavilion building are harmful to the integrity of the original masterplan.

o County Mall, south of the proposed Conservation Area, diminish the group value of the 1950s-60s buildings.

The northern side of the Boulevard was always distinct from the area to the south, being intended a focus for large offices and civic buildings, set back within larger individual plots, as distinct from the terrace style of building found in the shopping area to the south. As such the impact of changes north of the Boulevard on the cohesion and legibility of the proposed Conservation Area can be overstated. In any case the same objection might be raised against other established Conservation Areas whose setting has undergone more significant change.

We consider that the masterplan which was implemented should be assessed as a coherent plan in its own right, rather than being assumed to be inferior because it replaced an earlier plan.

The addition of the pavilion building in represents a significant alteration to the original layout of the square and the setting of the adjacent buildings but its impact on the special character of the area should not be overstated. The original buildings within the proposed area are relatively well preserved and the square, though reduced in size, continues to function as a focal point of the wider area. In addition the design of the pavilion building reflects some attempt to respond to the older surrounding buildings, for example in its height and the use of extensive glazing, glazing bars, and curtain walling on the main elevations.

The County Mall is outside of the proposed Conservation Area and was merely a car park in the original masterplan. It forms part of the setting of the area but its impact can be overstated. According to this logic you might equally argue that the presence of the ASDA store diminishes the group value of the pre 1914 buildings on the High Street, thereby undermining the justification for the High St CA.



		<p>o Modern infill has undermined its character and original layout. The quality of the surviving original architecture is attractive in places but lacks cohesion due to intervening modern development.</p> <p>o The recent Heritage Assets Review undertaken by Place Services for Crawley Borough Council (December 2020) concluded that the new town centre comprising The Broadway and Queen’s Square should not be designated as an Area of Special Local Character (ASLC), let alone a formally designated Conservation Area that would be subject to paragraphs 193-196 of the NPPF. This conclusion is considered to be sound and fully aligned with best practice guidance.</p> <p>o In coming to its conclusion, the Council must be mindful of the purpose of conservation area designation under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as the prime objective of the NPPF which is to promote and achieve sustainable development. To this end the NPPF states in Paragraph 186:</p> <p>“When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.”</p> <p>It should also be noted that Crawley New Town is not included on a list of potential 20th century conservation areas identified by the Twentieth Century Society in a recent study supported and promoted by Historic England; Conservation Areas Project - Potential Conservation Areas Scoping Report, December 2017.</p>	<p>The area assessed for local designation (ASLC) was not the same as that assessed for Conservation Area designation (see previous response to representation 13). The area within the reduced boundary proposed for Conservation Area designation has a strong townscape character, including areas which are largely authentic. With management, the area and its character can be enhanced and preserved. No new convincing heritage argument has been made to support the respondent’s objection.</p>	<p>As noted by Place Services, the original scheme implemented within the area is largely intact and still clearly legible. It retains a high degree of cohesion notwithstanding the change which has occurred, which is comparable to what you would find in other town centre Conservation Areas.</p> <p>We consider that the recommendations are fully in line with NPPF para 186. We consider that Place Services have been thorough and rigorous in applying national policy and best practice guidance. They did not support suggested Conservation Area extensions elsewhere (e.g. Hazelwick Road) precisely because these areas were not thought to justify the designation. We are confident that their recommendations are based on a rigorous and consistent approach.</p> <p>Concerning the 2017 report by the Twentieth Century Society referred to, this states:  <i>‘...the project coverage could not be comprehensive given the project’s timescale and resources. The list is not at all definitive and there are doubtless many other possible twentieth century candidates for conservation area designation.’</i></p>	
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	<p>In a similar vein it should also be pointed out that an audit of existing 20th century themed conservation areas undertaken by the Twentieth Century Society demonstrates that Crawley Borough is already well represented by such heritage assets. Indeed, Crawley Borough Council is one of the leading authorities in the country for its promotion and preservation of noteworthy examples of 20th century development that are considered significant because of their heritage interest, meriting consideration in planning decisions. These areas are of special interest, whereas the New Town Centre lacks the cohesion and integrity of these established designated heritage assets.</p> <p>Accordingly, we submit that the proposed Conservation Area lacks special interest for the reasons provided above and that its designation would devalue the concept of conservation, contrary to the purposes of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the objectives of the NPPF.</p> <p><u>Potential impact of Local Listing and Conservation Area designation</u></p> <p>In addition to the above, the proposal for the Local Listing and Conservation Area status, would limit the prospects of town centre renewal and regeneration which has commenced so successfully in Crawley Town Centre over recent years. The thrust of national planning policy is to see town centres/sustainable locations developed to their full potential. Locally the Crawley Local Plan sees the potential for further development within the Town Centre and with the increasing residential population the establishment of a Town centre 'neighbourhood'. The establishment of a Conservation Area/Local Listing will severely limit the opportunities for building above the existing buildings or the regeneration of sites (as has been successfully achieved recently on the south east side of The Broadway (29-15) given that schemes would need to meet the 'desirability of sustaining and enhancing the significance of heritage assets' test.</p> <p>There is considered to be a conflict between the potential designation of Heritage Assets and the desire set out in the Local Plan for further redevelopment within the town centre.</p> <p>As the Local Plan sets out; 'Crawley Town Centre is a sustainable location for residential development, as recognised through the mixed use allocations of Policy TC3 (Key Opportunity Sites within the Town Centre Boundary) and also through its identification under Policy H2 (Key Housing Sites) as a broad housing location. The Town Centre residential population has grown significantly in recent years, both as a result of planned developments and also through Permitted Development. This has meant the number of residents living in the Town Centre has increased significantly and, from a starting point of 214 residential units in 2014, there are now over 1,000 dwellings in the Town Centre, and a residential population of around 1,150 people. It is anticipated that, over the Plan period to 2037, a further 2,200 dwellings will come forward in the Town Centre, bringing the total to just over 3,000 residential units'</p> <p>Emerging Local Plan policies, all seek to support further growth, development and regeneration within the town centre:</p>		<p>The number of 20<sup>th</sup> century Conservation Areas (or Areas of Special Local Character) already existing in the borough is not directly relevant to the consideration of whether the proposed new area is an area of special architectural or historic interest. It should be considered in its own right. It is generally true that Crawley is rich in post-war architecture. The proposed Conservation Area is considered to exemplify this in a town centre context, whereas the other areas are residential estates or neighbourhood parades.</p> <p>We consider that the proposal is consistent with the objective of town centre regeneration and realisation of the full potential of the area. Heritage designation has formed part of a number of successful town and city centre regeneration schemes across the country and can help to attract grant funding. Conservation Area designation will allow change while respecting the special character of the area. It will also serve to highlight Crawley's 'story' as a post-war New Town, which is a central part of the town's character and identity.</p> <p>We think the proposed Conservation Area designation is consistent with the overall aims for the town centre which are set out in the Local Plan.</p> <p>The Town Centre (as identified in the draft Local Plan) has an area of 63.2 ha; the proposed CA has an area of 4.8 ha, and the amended High St CA would have an area of 4.1 ha. In combination therefore the two Conservation Areas would only cover 14 per cent of the designated Town Centre. The sites identified in draft Policy TC3 all fall outside the proposed Conservation Area. The proposed Conservation Area is considered to be consistent with the dwelling totals set out in the draft Plan.</p>	
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		<p>o H1 pro-active approach to identifying suitable sites for housing development</p> <p>o H2 The remainder of the land within the Town Centre Boundary outside the identified Town Centre Key Opportunity Sites (above), and Land East of London Road, Northgate are identified as broad locations for housing development</p> <p>o H3b: Densification, Infill Opportunities and Small Sites</p> <p>o H3c: Housing development in Crawley Town Centre, except at ground floor level within the Primary Shopping Area (Policy TC1) will be supported where it meets the criteria set out in H3, along with the specific requirements set out below, and where it is in conformity with the other policies</p> <p>o H3d: Upward Extensions – Housing development through upward extensions will be supported where it meets the criteria set out in Policy H3 and is in conformity with the other policies and requirements of this Local Plan</p> <p>In our view the proposed Heritage designations would be contrary to the aims of the Local Plan, supported by national guidance within the NPPF for sustainable development ideally on brown field sites in urban locations.</p> <p>For the reasons set out above we object strongly to the proposed local list nomination of the above properties and the proposed Queen’s Square and The Broadway Conservation Area. The idea of locally listing buildings and designating a new Queens Square will only result in inhibiting, restricting or deterring development. This seems counterintuitive. Whilst the buildings provide</p>		<p>The pro-active approach to identifying suitable housing sites set out in Policy H1 does not preclude respecting heritage significance, and is not inconsistent with the proposed CA.</p> <p>The H2 Town Centre ‘Broad Location’ can co-exist with the proposed Conservation Area just as it does currently with the existing High Street Conservation Area.</p> <p>This policy identifies character as a consideration and cross-refers to Policies CL2-CL4, which also have regard to character. Policy CL4 identifies ‘areas within or affecting the setting of the original New Town shopping precinct’ among the areas where ‘medium density’ development is appropriate, as distinct from the town centre more generally where ‘high density’ is appropriate.</p> <p>Policy H3c still requires high quality design and conformity with other policies, and as such is not in conflict with the designation of the proposed Conservation Area, any more than it is in conflict with the existing High Street Conservation Area.</p> <p>Policy H3d still requires development to ‘respond to and enhance the existing character’, which is consistent with the recognition of heritage significance through Conservation Area designation.</p> <p>We believe that the proposed Conservation Area is consistent with the NPPF and with national guidance, which (alongside legislation) make detailed provision for the recognition of heritage significance.</p> <p>We feel that the proposed Conservation Area would still allow development but would ensure that key elements of the existing character were respected, and that</p>	
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		some historic context for the New Town, in our view a New Town should be forward looking and these buildings are not attractive and are part of the problem that New Towns have across the country. Where other New Towns are looking to regenerate and improve these buildings, we are concerned that the Council are looking to protect them. In our view, development should be allowed to occur in an organic way thereby allowing the town to adapt to the new world. We should be encouraging the development of new sustainable/green buildings that are built for the next 50+ years, with modern mixed use properties.		a high standard of design is achieved. This would help to ensure that this part of the town centre retains a sense of place and a sense of connection with Crawley's identity as a New Town, and does not simply become a generic 'anywhere' town centre. We think that there are good precedents for this elsewhere, including town/city centres of post-war origin.	
15	Historic England	<p>Thank you for consulting us on the draft conservation area appraisals for Gossops Green and Queen Square, as well as the consultation draft for locally listed buildings. We do not wish to offer detailed comments on this occasion but are pleased that your Council have undertaken this work which will feed into future planning decisions locally. We are also pleased that Historic England's Advice Notes 1 and 7 on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage have been used as a basis for the proposals.</p> <p>We think that it is positive that the Heritage Asset Review includes management recommendations, as this will enable the documents to be of most use in the planning process. We are pleased that this approach is intended for the conservation area appraisals subject to the outcome of this consultation.</p> <p>We note that Advice Note 7 states that locally listed buildings and areas lists should be easily accessible and published online and on the Historic Environment Record. It is implied within appendix A1 Non-Designated Heritage Asset Review that this would be undertaken, but we would encourage you to make this more explicit in the document. We also note that while it is clear the draft conservation area appraisals use Advice Note 1, this is not explicitly stated, and we suggest that this is added within the methodology.</p> <p>It is not necessary for us to be consulted on these documents again, unless there are changes which have an impact on the historic environment, and especially designated heritage assets. However, if you would like detailed advice from us, please contact us to explain your request.</p>	Comments from HE generally supportive and recognise that Historic England's Advice Notes 1 and 7 on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage have been used as a basis for the proposals. We note HE's comments regarding Advice Note 7 and the publishing of locally listed buildings and areas lists online.	We note that the Historic England comments are generally supportive of the approach taken.	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
16	Ifield Village Conservation Area Advisory Committee	The justification for making Queens Square and The Broadway a conservation area seem sound i.e. it is a relatively intact example of post war New Town planning. The challenge will be to maintain it as a lively place given the impact of on-line shopping on retail businesses. The designation of it as a Conservation Area might help to prevent any further unsuitable additions being made (your report mentions some of the perhaps unwise additions of the past).	Note comments are supportive.	We note support for the proposed designation.	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)
17	Inaltus Ltd on behalf of building owner	<p>Thank you for your letter dated 26th February 2021 to our client Galgorm Properties.</p> <p>Our client owns the property known as the Queensway Stores, 20-24 Queens Square, Northgate, Crawley. Our client's property is impacted by the proposed designation of Queens Square and The Broadway as a Conservation Area.</p> <p>We have reviewed the Council Draft Conservation Area Appraisal and its associated documents.</p> <p><b>Conservation Area or Area of Special Character</b></p> <p>It is notable that the Council appear to be designating the area as a Conservation Area despite the absence of any statutorily listed buildings. Whilst</p>	The initial assessment of Crawley New Town Centre (Appendix C1) looked at the possibility of designating part of	We note and appreciate the response. However, we do not feel that it provides substantive reasons	Designation of Queens Square and The Broadway

		<p>we acknowledge that a Conservation Area does not need to have a formal listed building, the absence of any is somewhat surprising, and consequently, we question whether a formal Conservation Area is wholly appropriate in this context. We consider that an alternative heritage designation might be more appropriate for the area, which affords a degree of protection to the character of the area, but which does not impose on the area the strict controls that a Conservation Area designation brings with it. In this respect we note that the emerging Local Plan appears to cater for area of Crawley's modern expansion and suggest they should be designated as Areas of Special Local Character. The draft Local Plan states the following:</p> <p><b>Areas of Special Local Character</b>  <i>6.21 As a result of Crawley's unique history the borough contains some areas which, though they may not possess sufficient heritage significance to justify their designation as Conservation Areas, are nonetheless of sufficient significance to warrant their identification as local or 'non-designated' heritage assets. These Areas of Special Local Character are identified on the Local Plan Map and in the council's updated Local Heritage List which will become a Supplementary Planning Document. Their significance is reflective of different phases of human activity and settlement within the borough, from the medieval period to the town's modern expansion. They should be afforded protection to prevent them being lost, incrementally or at once.</i></p> <p><b>Flexibility Within the Conservation Area if Adopted</b></p> <p>We acknowledge that the Queensway Stores will be located within the Conservation Area should the Council adopt the proposed Conservation Area boundary. In doing so we would note that the creation of the Conservation Area will add a degree of cost and constraint to our client and their proposed design and refurbishment of Queensway Stores.</p> <p>We note that Map 2 of the Appraisal shows that two sides of Queens Square (east and west) contains no Locally Listed Buildings, and most of the south side has no listed buildings. The absence of such Locally Listed buildings provides a reasonably helpful backdrop to the future refurbishment of the Queensway Stores. Whilst we expect there is limited argument for removing Queens Square from the Conservation Area boundary (albeit we consider that the Queens Square might be better designated as an Area of Special Local Character), we do consider that the Appraisal and the final designation should provide an acknowledgement that Queensway Stores should be viewed as an opportunity for change and improvement, bearing in mind the town centre location of the site and the need for a mix of uses to regenerate and revitalise town centres.</p> <p>The Council recognises in the Economic Profile of the area that there is a clear challenge in town centre locations to increase footfall and activity which is traditionally part of the essential character of the area. As such, it is important that the council carefully balances the heritage interests in Queens Square with its function as a shopping area and the imperative need to boost the economic life of the area. Town Centres are under significant pressure and it is important that Conservation Area designations do not make the current very challenging circumstances worse through additional barriers to investment.</p> <p><b>Conclusion</b></p> <p>In light of the above, we endorse the decision not to locally list Queensway Stores. We also suggest more justification is required for the Queens Square to form part of a Conservation Area, when it might be better served as an Area of Special Local Character.</p>	<p>the New Town Centre as an Area of Special Local Character (ASLC). The boundary for this assessment was large, including almost all of the buildings on the southern side of The Boulevard, and the entirety of The roadway and Queensway. This large area was found to not possess enough architectural or historic interest to justify the creation of an ASLC due to the amount of modern development which has occurred, diluting the original design and architectural interest of the area. It was recommended that the New Town Centre area was re-assessed with a more compact boundary, as there are buildings of local interest within the New Town and other structures which retain original detailing. These elements create a sense of the original appearance of the New Town Centre, however, the character was not coherent nor easily discernible within the larger boundary of the area which was used for the initial ASLC assessment.</p> <p>A subsequent assessment was undertaken (Appendix C2), which looked at the suitability of creating an ASLC within the New Town Centre again, this time with a reduced boundary. It was found that with this revised boundary there was a more legible townscape character, and the impression of the New Town Centre's original appearance was more tangible. It was concluded that it was not appropriate to designate the revised boundary as an ASLC as it possessed greater significance than a non-designated heritage asset. It was felt that there should be further assessment of the area as a potential conservation area due to its special architectural and historic interest. Additionally, the threats to the New Town Centre could not be managed or addressed as effectively if it were to be designated as an ASLC, as</p>	<p>for amending the proposed approach.</p> <p>The presence of statutory listed buildings is not a prerequisite for Conservation Area designation and there are many precedents for Conservation Areas lacking them, including the following Conservation Areas within Crawley:</p> <ul style="list-style-type: none"> <li>- Forestfield and Shrublands</li> <li>- Hazelwick Road</li> <li>- Malthouse Road</li> <li>- Southgate Neighbourhood Centre</li> <li>- Sunnymead Flats</li> </ul> <p>The acceptability of any given scheme (whether inside or outside of a Conservation Area) would have to be determined via the planning process.</p> <p>In due course (if the area is designated) a Conservation Area Statement will be prepared and subject to public consultation. This will include an appraisal, as well as development guidance and a management plan which will provide greater scope to identify opportunity areas.</p> <p>We agree that regeneration in the town centre is a key objective, but we feel that Conservation Area designation can bring benefits in this area. E.g. making the town centre an attractive location for investment by defining, celebrating and reinforcing what is distinctive about Crawley as a place.</p> <p>No decision in respect of Local Listing has as yet been made.</p>	<p>Conservation Area recommended (see map)</p>
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		<p>Notwithstanding this, we also consider that the Conservation Area appraisal should provide more guidance on the flexibility for change of buildings that are clearly important economic anchors and lack the heritage aspects of design to makes them worthy of being locally listed. We suggest the Council highlight locations around Queens Square where investment and upgrading of shop front design and increased mixed uses will be encouraged.</p> <p>As a key stakeholder in the area, we would welcome opportunity to comment further should the Council propose any further alterations to the draft Conservation Area.</p>	<p>this would not bring with it additional planning controls.</p> <p>We maintain that the area assessed with the revised boundary does have special interest and a distinct character worthy of preservation and enhancement. It is felt that conservation area status would be of most benefit to the New Town Centre. However, the alternative of creating an ASLC within the New Town Centre (with the boundary of the Appendix C2 recommendation) is an alternative as this would still acknowledge its architectural and historic value.</p> <p>Regarding the inclusion of buildings within the New Town Centre on the Council's Local Heritage List, they are considered to meet the criteria for designation and the recognition of their local interest only strengthens the argument that the Appendix C2 area boundary has architectural and historic value worthy of designation as either an ASLC or a conservation area. The two designations (buildings included on the Local Heritage List and the ASLC or conservation area) would enhance each other. Also, whilst local listing without conservation area designation would help protect the individual buildings, it would fail to recognise the urban design and masterplanning of the 1950s New Town Centre, as well as the overall character of the area, which would be acknowledged and celebrated through conservation area designation.</p>	<p>We feel that Place Services' assessment and the draft Conservation Area appraisal provide a strong base of evidence to support the proposed designation.</p> <p>Further developer guidance, identification of opportunities, and management proposals can be set out in a Conservation Area Statement. This would be subject to consultation prior to adoption by the council.</p> <p>Comment noted.</p>	
18	John Handley Associates Ltd on behalf of building owner	<p><b>Covering Email</b></p> <p>Conservation Areas and Locally Listed Buildings Consultation Submission on behalf of Equorium Property Company Ltd In respect of: 32-34 Queens Square, Crawley</p> <p>We refer your letter of 26 February 2021 addressed to our clients, Equorium Property Company Ltd, providing an opportunity to submit comments on the Council's Conservation Areas and Locally Listed Buildings Consultation by 31 March 2021.</p>			Designation of Queens Square and The Broadway Conservation Area recommended (see map)

	<p>On behalf of Equorium Property Company Ltd, the owners of nos. 32-34 Queen’s Square, we have reviewed the various consultation documents, and have prepared the attached letter setting out our client’s response.</p> <p>For the reasons set out in the attached submission, we would request that the Council does not progress the proposed designation of nos. 30-40 Queens Square, Northgate, Crawley as a Locally Listed Building; and does not include these properties within the new Conservation Area at Queens Square and The Broadway. The full grounds for our request is set out in the attached letter.</p> <p>We trust these comments will be afforded due consideration, and we would be grateful if you would acknowledge safe receipt of this submission and keep us updated on the progress of the proposed Local Listing and Conservation Area designations process.</p> <p><b>Report</b></p> <p>We refer your letter of 26 February 2021 addressed to our clients, Equorium Property Company Ltd, and providing an opportunity to submit comments on the Council’s Conservation Areas and Locally Listed Buildings Consultation by 31 March 2021.</p> <p>On behalf of Equorium Property Company Ltd, the owners of nos. 32-34 Queen’s Square, Crawley, we have reviewed the various consultation documents, including the proposed creation of a new Conservation Area at Queens Square and The Broadway, and the proposed designation of nos. 30-40 Queens Square, Northgate, Crawley as a Locally Listed Building.</p> <p>Having reviewed the material available on the Council’s online consultation, we would wish to provide the following comments on behalf of Equorium Property Company. Boundary of Proposed Conservation Area</p> <p>Proposed Conservation Area and Local Listing</p> <p>The justification for both the proposed Conservation Area designation and the local listing of nos. 30-40 Queens Square is set out in the Conservation Area Appraisal and the accompanying Local Heritage Consultation Draft. These documents note that it is essentially for reasons related to the historic and architectural interest of the Square and the properties that front it that are considered to be significant and worthy of designation and protection. The Conservation Area Appraisal advises that: “the interest of the area lies in its status as a relatively intact and extensive example of post-war town centre planning in one of England’s original post-war New Towns. These origins are reflected in the overall scheme, the approach to design, and the architectural features, detailing and materials characteristic of the area”.</p> <p>The Conservation Area Appraisal also advises that: “The architectural interest of the area arises from its status as an example of post-war New Town development, and the way in which this is realised in the coherence of the overall scheme, its layout, built form, style, detailing, and materials, and in the presence of certain typical ‘new Town’ features such as public art”.</p> <p>Major Changes to the Layout and Character of Queens Square</p> <p>It is accepted that the Square and nos. 30-40 were planned, designed and implemented as an integral part of the post-war New Town development and clearly have historic interest on this basis. However, and as noted in the Conservation Area Appraisal, the character, integrity and layout of Queens Square, particularly as it relates to nos. 30-40 has been significantly and</p>	<p>In response to the representation from John Handley Associates Ltd on behalf of building owner, while the Pavilion in Queens Square and other alterations have had a</p>	<p>We note and appreciate the response. However, we do not feel that it provides substantive reasons for amending the proposed approach, for reasons set out below.</p> <p>The addition of the pavilion building in represents a significant alteration to the original layout of the square and the setting of the adjacent buildings but its impact on the special character of the area should</p>	
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substantially altered by the introduction and implementation of the large Pavilion retail development in 2005.

The extensive, modern Pavilion retail building was clearly not part of the original New Town development, and its fairly recent introduction has, in our opinion, seriously and permanently eroded the original character, setting and layout of the Square and the properties that front it in this particular location; i.e. nos. 30-40, to their significant detriment. The insertion of this new building has therefore significantly altered any historic and architectural integrity and interest that the properties may have had in the past.

The photographs provided below illustrate the significant adverse impact of the Pavilion retail development on the integrity, layout and coherence of the Square.



View of Queens Square from c. 1967 with 30-40 Queens Square on right of photograph



Same view from May 2018 showing the Pavilion Retail Development as the dominant and overbearing feature in the streetscape

negative impact on the architectural cohesion and character of the area, many original features survive. Despite some harmful alterations the area still retains a strong townscape character, including largely authentic areas and it retains sufficient architectural and historic special interest to warrant protection. With careful management and the prevention further unsympathetic development, the area and its character would be enhanced and preserved.

not be overstated. The original buildings within the proposed area are relatively well preserved and the square, though reduced in size, continues to function as a focal point of the wider area. In addition the design of the pavilion building reflects some attempt to respond to the older surrounding buildings, for example in its height and the use of extensive glazing, glazing bars, and curtain walling on the main elevations.





View of Queens Square c. 1980 with 30-40 Queens Square on left of photograph



Same view from 2018 showing how the Pavilion Retail Development has substantially altered the open nature of the Square which now has the appearance of a modern (i.e. 2020s) shopping area and not a 1950's New Town.

The photographs set out above clearly confirm that the coherence of the Square and in particular its layout, built form, style, detailing, and materials have been substantially altered in recent years. The Square's architectural interest (and one of the primary reasons for justifying its Conservation Area and Locally Listed designations) has therefore been subjected to significant change. It now has the appearance, character and feel of a modern (i.e. 2020s) shopping area, not a 1950s new town.

These significant changes and irreversible alterations to the Square and nos. 30-40 have been confirmed in the Conservation Area Appraisal which specifically notes that: "Numbers 30-40 Queen's Square would originally have faced 1-11 Queens Square...At the western end of this frontage 1-3 Queens Square (along with 7-13 The Broadway) has recently been reconstructed at first and second storey level to form flats, and in the process the original symmetry between 1 and 40 Queens Square has been lost, thereby eroding some of the character of the area".

The Locally Listed Buildings Consultation Draft also confirms this weakness and notes that "Nos. 4-19 and 30-40 all present similar architectural features...These two rows of shops would have once faced one another, however modern buildings have been constructed facing Queens Square which has resulted in the disconnect of the two architecturally related buildings."

As such the architectural qualities, and indeed the historical interest, of the Square in this particular location have been significantly compromised. As a result any special character or interest that it may once have had has been

It is important not to overstate the extent and impact of the change which has occurred, or deprecate the extent to which the original scheme remains present and legible. The Queens Square area, like all town centres (whether in Conservation Areas or not) has undergone change since the 1950s: the question is whether or not a sufficient level of special architectural or historic interest persists overall. We feel that it does and we would maintain that the area does still have the appearance of a 1950s new town.

Identifying changes or sites that detract from the special architectural or historic interest of the area is part of best practice when appraising a Conservation Area. It is important to be mindful of factors which make a neutral or negative contribution, but the fact that they exist does not in itself invalidate the concept of Conservation Area designation. Realistically such sites or changes would be found in most town or city centre Conservation Areas.

irreversibly lost, and it is not, in our opinion, worthy of being considered suitable for inclusion either as part of a designated Conservation Area, or a Locally Listed Building

Boundary of Proposed Conservation Area

We would also add that the proposed Conservation Area boundary splits our client's property in two and – quite rightly as the photographs below confirm – omits the rear extension of nos. 32-34 Queens Square.

However, the proposal to locally list nos. 30-40 Queens Square would need to take in the entirety of our client's property as it is a single planning unit. That would therefore mean that the rear portion of the property which is an integral part of the curtilage of the property would fall within the Local Listing. As the photographs below show, there is clearly no architectural or historical merit in the rear elevations. This property is therefore clearly not an appropriate candidate for a Local Listing.



Photographs from September 2020 of rear part of nos. 32-34 Queens Square which are proposed to be locally listed for their historic and aesthetic value



Photographs from September 2020 of rear part of nos. 30-40 Queens Square which are proposed to be locally listed for their historic and aesthetic value

Summary and Recommendation

We do not consider that the impact of the addition of the Boulevard and the changes at 1-3 Queens Square has been so detrimental as to undermine the justification for Conservation Area designation. This is consistent with Place Services' findings.

We are also of the view that the architectural and historic interest of nos 32-34 is concentrated within the proposed Conservation Area boundary.

No decision has yet been taken in relation to Locally Listed Buildings.

		<p>For the reasons set out above and illustrated in the various photographs, it is clear that these properties do not meet the required criteria of being buildings of special character or interest, either architecturally or historically.</p> <p>Any significance or interest that they may have had in the past has been substantially altered and irreversibly lost as a result of major changes to the properties and the Square and its layout and setting.</p> <p>These buildings are not therefore worthy of being considered suitable for inclusion either as part of a designated Conservation Area, or a Locally Listed Building.</p> <p>We would therefore request on behalf of the owners of nos. 32-34 Queens Square that the Council does not progress the proposed designation of nos. 30-40 Queens Square, Northgate, Crawley as a Locally Listed Building; and therefore does not include these properties within the new Conservation Area at Queens Square and The Broadway.</p> <p>We trust these comments will be afforded due consideration and we would be grateful if you would acknowledge safe receipt of this submission and keep us updated on the progress of the proposed Local Listing and Conservation Area designations process.</p>		<p>As set out above we remain of the view that the designation of a Conservation Area including these properties is justified.</p> <p>No decision has yet been taken in relation to Locally Listed Buildings.</p>	
19	Member of the public 10	<p>Proper planning and thought should go into any new conservation areas so that they are a success. Unfortunately recent conservation areas have been poorly thought out. Example being Crawters Brook which has a dipping platform but no water for children to dip into. Ridiculous and embarrassing.</p>	<p>Historic England's Advice Notes 1 and 7 on Conservation Area Appraisal, Designation and Management, and Local Heritage Listing: Identifying and Conserving Local Heritage have been used as a basis for the proposals. Conservation Area management recommendations have been made in the appraisal documents. Place Services understand that Crawters Brook is a nature conservation area, not an area designated for its historic or architectural interest.</p>	<p>We understand the importance of properly thinking through the proposals. In due course we propose to consult upon and adopt a Conservation Area Statement for the area, including design guidance and management proposals.</p> <p>It is, however, important to emphasise that this proposal is not about creating a new park/reserve or similar as at Crawter's Brook. Instead the proposal is to designate the land within the identified boundary as a Conservation Area in order to preserve and enhance its existing special character.</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>
21	Member of the public 12	<p>I am in support - see introductory statements. (I enthusiastically support all the comments I have read that have been submitted in favour of preserving as heritage of as much as is possible to what was planned for Crawley by the new towns commission...and manifested... by them at the time. I also support to all comments to that preserve buildings and spaces that pre-date the new towns commission when it came into being established. The buildings and spaces that predate their efforts provide some context and history too. Such as peace gardens and parks and open spaces that allow more to reconnect to nature and history. Thus my comments to all buildings would be..." Preserve so as to allow more to reconnect to nature and history or this new and old town.") I would include Furnace Green local shopping centre, Tilgate and the Worth Park as well as the residential flats above them.</p>	<p>Note comments are supportive.</p>	<p>We note support for the proposed designation.</p> <p>The parades at Furnace Green and Tilgate and Worth Park do not fall within the scope of the Conservation Area proposals. Other heritage designations are more relevant to them ('Locally Listed Building' status in respect of the parades; 'Historic Park and Garden' status in respect of Worth Park.</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>
23	Member of the public 14	<p>I don't consider that the buildings in this area are of sufficient architectural interest to warrant a designation as a Conservation Area. These buildings are uninteresting and unattractive. We would be better off demolishing them and rebuilding from scratch. I'm sure we could build something new which would be much more aesthetically pleasing.</p>	<p>The area is an example of post-war architecture and representative of the planned layout for Crawley's New Town Centre. The assessment by Place Services identified social and communal value as an example of</p>	<p>We note and appreciate the comments. However, we agree with Place Services' finding that the coherence and extent of survival of the 1950s layout and architectural scheme mean that this is an area of special architectural and historic</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>

			a New Town and post-war regeneration in England. In addition, the area has a high group value and other original post-war neighbourhood areas of Crawley, with motifs and concepts prominent within the town centre repeated elsewhere. The area has important townscape value and retains the intended block plan, arrangement and scale of development. It was therefore considered to be of special architectural and historic interest worthy of preservation and enhancement.	interest, even if many of the individual buildings are not of sufficient interest in their own right to justify Locally Listed status. If the area is redeveloped wholesale there is a risk that this would result in a generic 'anywhere' style of development, lacking the cohesion which makes the 1950s scheme greater than the sum of its parts.	
29	Member of the public 2	<p>I would like to see Queen's Square and part of the Broadway included in a conservation area if the local council would support its Advisory Committee's/local residents when they advise of planning breaches or advise on planning applications.</p> <p>Queen's Square - the blue mosaic columns - I would like to see these restored and where they may have been covered up - out-side the shop " New Look" for example*, they should be retained and restored - part of a memory and look of the early new town shopping centre. * haven't seen under the white around the column but am assuming that they are under the shell somewhere.</p> <p>The map used in C1 5.1 - showing the New Town Centre is an old map and shows a car park to the east of Friary Way for example. It is actually the site of a large shopping mall which is over 25 years old.</p>		<p>Noted that the response is accepting of the heritage rationale for the designation.</p> <p>The identification of a 'car park' at the County Mall site is a feature of the relevant Ordnance Survey dataset. This is probably a reference to the multistorey parking provided on the County Mall site.</p>	Designation of Queens Square and The Broadway Conservation Area recommended (see map)
32	Member of the public 22	<p>Including Soft landscaping and connection to existing wild life corridors. Policy related to people movement within area re mobility impaired, bikes, electric scooters etc.</p> <p>More details required along with public discussion.</p> <p>No definite plan submitted.</p>	Comments noted	We note the comments: it is, however, important to emphasise that we are not proposing to redesign the landscaping or rights of way in the area or part of it, but instead to preserve and enhance its existing character.	Designation of Queens Square and The Broadway Conservation Area recommended (see map)
34	Member of the public 24	Yes this is an area of historical significance to the history and development of this Town/City.	Note comments are supportive.	We note support for the proposed designation.	Designation of Queens Square and The Broadway Conservation Area recommended (see map)
36	Member of the public 26	I am opposing the creation of the Queens Square and The Broadway Conservation Area. Unfortunately, this plan comes too late. What remains of Queens Square and the Broadway today has little to do with the original urbanistic plan, which had in mind a visual and logistic connection between the historic High Street and Queens Square. It was a sensitive and clever plan that was thoroughly destroyed by the building which is currently housing The Gym and Iceland. This created two dark drafty passageways leading to the Broadway with no continuation onto the historic High Street. As a result, the New Center and the historic Center became isolated from each other, the center of gravity shifting further after the development of County Mall and the passage leading up to it. At that point, the historic High Street became morally obsolete, and declined leaving only banks and estate agents in its fine houses. Even at peak times, it has little foot-fall. Unfortunately, the 1980 and 1990 had little understanding for modernist aesthetics and as a result we are where we are. Now, it became the modern Town Centre's turn to become obsolete as shoppers move towards	While recent buildings and other alterations have had a negative impact on the architectural cohesion and character of the Queens Square/Broadway area, many original features survive. The area still retains a strong townscape character, including largely authentic areas and it retains sufficient architectural and historic special interest to warrant protection. With careful management and the prevention further unsympathetic development, the area and its	We note and appreciate this response. We are, however, in agreement with Place Services' assessment that the layout and architectural character of the original 1950s scheme is still largely intact and legible, notwithstanding the change which has come with the creation of the Pavilion, The Broadgate, and the alterations at 7-13 The Broadway and 1-3 Queens Square. We consider that the historic high street as well as the proposed Conservation Area remain viable	Designation of Queens Square and The Broadway Conservation Area recommended (see map)



		<p>online shopping. There has been a pitiful replacement for the loss of BHS, and I am certain that Debenhams and Peacock's demise will create just more unused space. At the same time planning permission was granted to take down one of the original buildings in the Broadway and replace it with a multi-story residential building. Another building in the Broadway turned residential with a penthouse on top and total remodelling of its original 1950's look. There is little of the original 1950's architectural ideal left, which is a shame, but the clock cannot be turned back. To create a Conservation Area encompassing Queen Square and the Broadway at this point is of little use apart from making it difficult to have the remaining buildings redeveloped. Considering that CBC is heavily involved in the redevelopment of the Boulevard, I worry, this will be seen by many as double standards. At this stage, when demand for retail space is dropping fast, I suggest the redevelopment of the Queen Square area and the Broadway into residential use is allowed to continue without undue hindrance. This will increase footfall in the centre and create a feeling of ownership. The existing County Mall is perfectly adequate to cater for all retail needs, and there is hope in the form of the new butcher shop in Queens Square that local residents would require local shopping. If the town centre becomes successful residential area, it will also justify all the investment in bringing Queen's Square up to date. CBC' efforts and especially long term planning should be concentrated on reconnecting the new central residential area with the historic High Street and shift Crawley's civic centre once more back to its original position. The much smaller scale of the historic High Street will cater for our modern needs very well. It is necessary to remember that towns are living organisms, they have changed throughout history, sometimes with a speed on par with the times we live in. We cannot conserve the past, only an illusion of it. Snob value is of little importance here. The only important thing is that we live in a place where we feel instantly comfortable and anchored and we cherish it for those qualities.</p>	<p>character would be enhanced and preserved. The importance of heritage assets is recognised in the Planning (Listed Buildings and Conservation Areas) Act 1990 and in national and local planning policies, including the NPPF, which states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Heritage assets, including Conservation Areas contribute to the unique character of a place. There are also wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.</p>	<p>and attractive as part of an evolving town centre, fulfilling a range of functions in addition to retail. We feel that the heritage significance of the proposed Conservation Area has the potential to support town centre regeneration objectives, providing a sense of place and highlighting Crawley's identity as a New Town. We continue to support non-residential uses at ground floor level within primary and secondary frontages. The proposed Conservation Area will not be a bar to further development provided that this respects the existing character and demonstrates high quality design. Without careful management the risk is of haphazard, piecemeal alterations detracting from the area's sense of cohesion and undermining its town centre function. With regard to the area north of the Boulevard: this was always a 'civic' area defined by taller detached buildings set back within large plots, as distinct from the more close-knit terrace format of the area to the south of the Boulevard. We therefore do not feel that changes north of The Boulevard undermine the case for the proposed Conservation Area.</p>	
37	Member of the public 3	<p>All very well publishing the guidance for Conservation Areas, but even the Council's own contractors do not follow the recommendations when they renovation buildings in a conservation area, and although they are supposed to take into account the Conservation Areas when they give planning permission for buildings adjacent to the area, this is largely ignored in the rush to claim how many 'homes' (mostly flats) they have provided. These Conservation areas seem to be mostly 'window dressing' as far as I can see, as there is no commitment to preserve the heritage.</p>		<p>We note and appreciate the comments. Any planning application decision in relation to a proposal affecting a Conservation Area or its setting should give consideration to this impact and determine the application in accordance with national and local policy. This does not necessarily mean that permission for new development will be refused, for example where a new development respects the existing character of the area and meets high design standards.</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>
38	Member of the public 4	<p>No issues</p>		<p>No comment required.</p>	<p>Designation of Queens Square and The Broadway Conservation Area recommended (see map)</p>
41	Member of the public 7	<p>No justification for inclusion</p> <p>There are no buildings in Queens Square that are worthy of being added to conservation. The centre should be updated to modern standards.</p>	<p>The Conservation Area Designation would not suppress 'modern standards', but would provide a level of protection to</p>	<p>We agree with the Place Services assessment that the coherence of the 1950s layout and architectural scheme and the extent to which</p>	<p>Designation of Queens Square and The Broadway</p>

		Comment on proposed boundary: Not appropriate	ensure the survival of the unique historic character of the area.	they have survived give the area special historic and architectural interest.	Conservation Area recommended (see map)
44	Member of the public 9	Any work done in Queen's Square needs to be properly completed maintained and the whole area kept clean. At the moment lots of money recently spent and it looks a mess, chewing gum and staining on very expensive paving slabs. Little evidence of upkeep on any greenery (and not enough greenery. Stop improving!! and start maintaining.		Conservation Area designation has the potential to encourage improved maintenance and attract funding towards environmental improvements. Maintenance issues to not represent a reason not to designate a Conservation Area.	Designation of Queens Square and The Broadway Conservation Area recommended (see map)
<b>CONSERVATION AREAS (proposed boundary changes)</b>					
<b>High Street Conservation Area</b>					
<b>Ref No.</b>	<b>Respondent</b>	<b>Comments</b>	<b>Place Services response</b>	<b>CBC response</b>	<b>Recommendation</b>
11	Central Crawley Conservation Area Advisory Committee	<p>On recommended extension of CA northwards to include The Tree (the home of Crawley Museum): Whilst the Committee supports this change any changes to the CA should be held in abeyance until the updated CAS has been completed in draft.</p> <p>On the recommended removal of Gainsborough House &amp; St John's House at the Southern End of the CA: As discussed above any changes should be held in abeyance until the updated CAS has been completed in draft. Gainsborough House demonstrates how a quite large building can be added to the High Street without looking out of place. It should be noted that St John's House is 'L' shaped with the short leg coming out into the High Street, previously the site of the original Iceland store. Does that mean the new building in the High Street which is part of the St John's House build is out of the CA as well?</p> <p>On the recommendation not to extend the CA southwards to the railway (and the boundary with the Brighton Road CA): There are three buildings on the eastern side of the High Street adjacent to the level crossing that Place Services seemed to have overlooked in not supporting the extension. They are dwellings that have had their front rooms turned into a shop or been extended out into their front gardens to provide a shop. This was probably done in the latter part of the 19th century. There is a photo of the shops in the condition described above dated 1905. Whilst it is accepted that the western side of this part of the High Street adjacent to Asda should not be included in the conservation area further consideration should be given to the eastern side.</p>	The further assessment of the boundary will be carried out as a part of any future appraisal document.	<p>We largely support the findings of the Place Services assessment in relation to the High Street Conservation Area boundary.</p> <p>The proposed southern boundary is shown on the map provided. The buildings referred to on the eastern side of High Street / Brighton Road north of the level crossing are separated from the rest of the Conservation Area by a large 'postmodern' office building (Portland House) and Haslett Avenue West. The extension of the Conservation Area to include the older buildings would therefore involve the inclusion of a larger area of modern development not in keeping with the character of the High Street CA.</p> <p>This is the same logic as applicable to the suggestion of extending the CA northwards to Boscobel / Furnace Cottage (see response to representation no. 28 below).</p> <p>We appreciate the importance of an updated Conservation Area Statement in helping to guide the council's approach to preserving and enhancing the character of the area. At the same time it is considered that the council, having obtained consultant advice on the Conservation Area boundaries, should implement the recommended changes without additional delay unless there is any overriding objection to them in principle. This will help to ensure that the Conservation Area designation operates as effectively as possible. It does not prevent further changes to the boundary in</p>	Northward extension recommended (see map). Southern boundary proposed largely as recommended although with retention of Gainsborough House within the Conservation Area.

				future where evidence to justify them is forthcoming. On the other hand additional delay would delay the benefit of the proposed northward extension, and may be seen to cast doubt on the consultants' findings, thereby making their implementation at a later date more difficult. Implementing these changes now does not prevent further changes to the boundary in future where evidence to justify them is forthcoming.	
16	Ifield Village Conservation Area Advisory Committee	Brighton Road; High Street; St Peters We support the extensions of these areas – they are relatively minor additions, although the Brighton Road one does include far more of the Victorian houses along East Park.	Note comments are supportive.	We note support for the proposed extension.	Extension recommended (see map).
23	Member of the public 14	I support these changes.	Note comments are supportive.	We note support for the proposed extension.	Extension recommended (see map).
28	Member of the public 19	The northern extension to the Conservation Area could perhaps be extended further to include the remaining 'green' on which remains the Diamond Jubilee Oak planted for Queen Victoria, and include Boscoble / Furnace Cottage which is 17th century?	There is considered to be too much separation, with extensive modern development between the northern end of the proposed new boundary and the Listed Boscobel. The special interest of the Conservation Area would be weakened by the inclusion of this area, which overall, lacks the same character. The listed building also currently has protection in its own right as a designated heritage asset.	We largely support the findings of Place services in relation to the High Street Conservation Area boundary.	Extension of Conservation northwards recommended to include 'The Tree' (Crawley Museum) but no further.
29	Member of the public 2	High Street - I agree that buildings on the East side towards the railway line should be included - there was some interesting glass work at the site of Crombie and Sadler Chemist - now a barbers - haven't been able to ascertain if it is still there as of today but I remember the shops in the 1970's when you went in they did have the feel of being part of a house - one next to the chemist I think which sold household wares and then became a Hoover/appliance shop. I also agree about the points on Gainsborough and St John's house and Boscobel House at the lower end.  I think by bringing in this part of the High Street up to the level crossing would be a good thing as the Brighton Road CA borders it and is in view.  I may have missed it but couldn't find Boscobel House (High Street) which if not already might be considered as part of the High Street extension.	Southward extension: The justification for not extending the Conservation Area boundary to the south and up to the railway line was given in Section 5.3 of Appendix D Conservation Areas Document.  Northward extension: There is considered to be too much separation, with extensive modern development between the northern end of the proposed new boundary and the Listed Boscobel. The special interest of the Conservation Area would be weakened by the inclusion of this area, which overall, lacks the same character. The listed building also currently has protection in its own right as a designated heritage asset.	We largely support the findings of Place services in relation to the High Street Conservation Area boundary.	Southern boundary proposed largely as recommended although with retention of Gainsborough House within the Conservation Area.  Extension of Conservation northwards recommended to include 'The Tree' (Crawley Museum) but no further.

**CONSERVATION AREAS (proposed boundary changes)**

**St Peter's Conservation Area**

Ref No.	Respondent	Comments	Place Services response	CBC response	Recommendation
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11	Central Crawley Conservation Area Advisory Committee	On recommended extension to include the Grade II Listed 60-62 Ifield Road: Accepted.	Note comments are supportive.	We note support for the proposed extension.	Extension recommended (see map).
16	Ifield Village Conservation Area Advisory Committee	Brighton Road; High Street; St Peters We support the extensions of these areas – they are relatively minor additions, although the Brighton Road one does include far more of the Victorian houses along East Park.	Note comments are supportive.	We note support for the proposed extension.	Extension recommended (see map).
23	Member of the public 14	I support these changes.	Note comments are supportive.	We note support for the proposed extension.	Extension recommended (see map).
28	Member of the public 19	64, Ifield Rd should be considered for inclusion, as it is built over a pond which is fed by the underground river which flows beneath 62&60, Prospect Place, and under the railway by the Horsham Rd crossing gates from Goffs Hill. There are also streams which link further down Ifield Rd and the allotments converging until joining Smalls Lane. Similarly this applies to Solstice, and the small park which has a pond, legacy of the Iron Industry [it was larger than the current park] it's stream connects to the pond beneath Asda. There is a 2nd stream from Asda under Peglar House all of which travel northwards to meet with the original Smalls Lane now beneath West Green Drive. If you have not already developed the Nurses old home this whole area would benefit from an Archaeological investigation. It is the centre of the original Crawley settlement.	Number 64 Ifield Road lacks the architectural and historic interest evident elsewhere in the St Peter's Conservation Area. The presence of a former pond at the site does not contribute to the character of the historic built environment. Further assessment of the archaeological potential of the area as the centre of the original Crawley settlement could be included within a future, area specific Conservation Area Appraisal and Management Plan.	We agree with the finding of Place Services that no. 64 Ifield Road does not have sufficient architectural and historic interest to merit inclusion in the Conservation Area.	Extension to include nos. 60-62 but not no. 64 (see map).
37	Member of the public 3	Proposed extension: Can't see why these were not included from the beginning		We note support for the proposed extension.	Extension recommended (see map).



## APPENDIX F

### SUMMARY ANALYSIS OF RATIONALE FOR NEW CONSERVATION AREAS / AMENDMENTS TO EXISTING CONSERVATION AREA BOUNDARIES

#### **Proposed New Conservation Area: Queens Square and The Broadway**

- 1.1. The proposed new Conservation Area boundary (Appendix A) includes the surviving extent of the central shopping district laid out for Crawley New Town in the 1950s, including Queens Square, The Broad Walk, The Pavement, and much of The Broadway, Queensway and the southern side of the Boulevard. The consultants assessed this area for potential Area of Special Local Character (ASLC) status but concluded that Conservation Area designation would be more appropriate due to the area's prominence. A larger area, including the Martletts, Parkside Car Park and the full length of Queensway was also initially considered for ASLC status, but was felt to lack architectural / design coherence.
- 1.2. 19 consultation responses were received regarding this proposed Conservation Area (as set out more fully in Appendix E, together with responses from the consultants Place Services and CBC). Views expressed were mixed. 6 respondents tended to support the designation and recognised the importance of the area to the identity of Crawley as a New Town. 8 objected to or were critical of the proposal, with the remainder being more neutral or commenting on separate matters. The main grounds of objection were as follows:
  - The area is not of sufficient historic or architectural interest to merit Conservation Area designation
  - To the extent that the area ever was of historic or architectural interest, this has by now been too much eroded by more recent changes to justify Conservation Area designation
  - Conservation Area designation would impede the full realisation of the area's potential to meet economic, housing, and other needs and support the modernisation of the town
  - Conservation Area designation would restrict development potential and have a negative impact on property valuesIn addition, some of the more neutral comments referred to issues of maintenance and queried whether Conservation Area designation would make any positive difference to the appearance of the area.
- 1.3. CBC officers and the consultants have given further consideration to these representations and further discussion has taken place with Crawley Town Centre Business Improvement District. On balance it is considered that Conservation Area designation based on the proposed boundaries would be justified and beneficial, with potential to achieve positive economic, cultural, and social impacts in addition to the core function of preserving and enhancing the historic and architectural interest of the area.
- 1.4. Firstly, the proposal is justified in terms of **heritage significance**, when assessed against nationally recognised criteria. The area was developed on a comprehensive basis during the 1950s by Crawley Development Corporation and was marked by a high degree of cohesion in terms of layout, architectural style, and detailing. This remains apparent to this day, notwithstanding the change which has occurred in the intervening period. As such the area represents a significant example of post-war New Town architecture and planning, exhibiting qualities which are increasingly coming to be appreciated for their historic interest. Queensway, Queens Square and

The Broad Walk feature in *Modern Buildings in Britain: A Gazetteer* (2022) by the historian Owen Hatherley, who states that ‘as an exemplar of fitting a New Town into an older one, this is excellent work.’<sup>1</sup>

- 1.5. Conservation Area designation would help to **enable change while respecting the special character** of the area, including its contribution to Crawley’s identity as a New Town. The intention would not be to block change but rather to ensure that changes take account of the key characteristics which define the character of the area, and achieve high quality design, as has been achieved in the existing High Street Conservation Area.
- 1.6. The heritage significance of the area, properly maintained and enhanced, would represent **an asset which can support economic regeneration objectives**. Heritage assets often contribute to the appeal of strong town and city centres, and the recognition of heritage frequently forms a key element of successful urban regeneration initiatives.<sup>2</sup> There are several aspects to this:
  - Heritage assets help to create an intangible ‘sense of place’, which needs to be experienced in person and therefore attracts people to an area.
  - Heritage assets bring to the fore the unique identity of a particular place, helping to reinforce its profile and ‘brand’.
  - Heritage assets and the story which they articulate can provide a focus for local pride and cultural participation, contributing to community wellbeing. The Government’s 2022 Levelling Up White Paper includes a mission to improve ‘pride in place, such as people’s satisfaction with their town centre and engagement in local culture and community’, recognising ‘culture and heritage’ as a key programme within this.
  - Heritage designation can provide a basis for stronger stewardship of an area, including through attracting grant funding, leading to a physical environment of higher quality and greater stability over time.
  - By improving the ‘experiential’ quality of an area heritage assets can reinforce the effects of other interventions such as cultural events.

The positive economic impacts arising from the presence of heritage designations are borne out in several analyses, including the finding that Conservation Area designation is associated with higher residential property values; faster growth in values.<sup>3</sup>

- 1.7. It is important to note that the perception of these relationships is not limited to more ‘traditional’ pre-twentieth-century heritage assets. There are over 250 existing twentieth-century Conservation Areas in England, including 4 in Crawley. Appreciation of leading examples of twentieth century and post-war urban planning and design has grown with time and has increasingly become a feature of town and city centre regeneration, as illustrated by the following case studies:
  - **Stevenage** was the first post-war New Town, and its Town Square Conservation Area was designated as a Conservation Area in 1988 and extended in 2010. The wider town centre setting of the Conservation Area is the focus of an ongoing regeneration programme with up to £1bn investment over 20 years, including additional homes, business space, leisure facilities, retail, infrastructure, public realm, and landscaping. The town’s modernist

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<sup>1</sup> Owen Hatherley, *Modern Buildings in Britain: a Gazetteer* (Particular Books, 2022).

<sup>2</sup> [‘Historical Opportunities: How Heritage-led regeneration can drive town centre change’, Lichfields, 2021](#); [‘Heritage and the Economy’, Historic England, 2020](#).

<sup>3</sup> [‘Heritage and the Economy’, p.39](#); [‘The role of culture, sport and heritage in place shaping’, TBR, 2016](#), pp. 2-3, 28-33; [‘An assessment of the effects of conservation areas on value’, LSE, 2012](#).

heritage and heritage assets have been an important influence in shaping the proposals.

- **Weston-Super-Mare's** 'Great Weston' Conservation Area was designated in 2018, combining several existing Conservation Areas and extending them to include additional areas of the town centre. These include a twentieth-century town centre district which was awarded High Street Heritage Action Zone status in 2020, with a grant of up to £1.1 million in funding from Historic England for physical regeneration and a cultural programme to engage people with the heritage of the area.
- **Plymouth** City Centre Conservation Area, focused on the modern city centre which arose following bomb damage during the second world war, was designated in 2019, in recognition of 'an outstanding example of post-war planning and modern architecture'. This was followed by the award of High Street Heritage Action Zone status in 2020 with a grant of up to £1.9 million towards regeneration and a programme of cultural activities to celebrate the area and its heritage significance. As of May 2022 Plymouth was registering the most successful post-Covid recovery in footfall of any UK city centre, as measured by the Centre for Cities High Streets Recovery Tracker.<sup>4</sup>

- 1.8. The designation of the proposed Conservation Area will help to **preserve the integrity of the Town Centre** by ensuring that the council has appropriate tools to manage the area going forwards. The ability of local planning authorities to manage development in urban areas has been increasingly affected in recent years by the expansion of permitted development rights, including the recent introduction of rights to build upwards extensions on terraced commercial buildings, and to convert vacant ground floor commercial premises to residential use. Like a number of retail trade bodies, the council has previously expressed concerns that the impact of these permitted development rights could result in the erosion of high streets and town centres as a result of poor-quality development and the sporadic and unplanned loss of ground floor commercial units to residential use, leading to unattractive 'dead' frontages, and a loss of environmental quality and commercial vitality.
- 1.9. Conservation Area designation would remove or restrict these permitted development rights. For example, the right to convert ground floor premises to residential use would become subject to consideration of 'the impact of that change of use on the character or sustainability of the conservation area'. While the potential impact of these permitted development rights does not in itself provide the primary reason for Conservation Area designation, therefore, it does reinforce the argument that designation can bring wider economic and environmental benefits to the Town Centre.

## **Gossops Green Neighbourhood Centre**

- 1.10. The proposed Conservation Area boundary reflects that used in the 'Areas of Special Local Character Assessment' prepared by the consultants. It is focused on the core of the neighbourhood, comprising the parade, the Windmill pub and St Alban's church, together with surrounding areas of housing and open spaces on Gossops Drive, Medway Road, Lavant Close, Cobnor Close, Rother Crescent (north side), Buckswood Drive (north side) and Kidborough Road (west side).
- 1.11. There were 11 consultation representations relating to this proposed Conservation Area (as set out more fully in Appendix E, together with responses from the consultants Place Services and CBC). Views expressed were mixed. A number of

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<sup>4</sup> <https://www.centreforcities.org/data/high-streets-recovery-tracker/> (accessed 12 May 2022)

respondents supported the designation and recognised the importance of the area as a superior example of one of Crawley's original neighbourhood centres. Others were critical of the proposal. The main grounds of criticism were as follows:

- The area is not of sufficient historic or architectural interest to merit Conservation Area designation;
- The area is poorly maintained/managed and has become run-down and unattractive.

- 1.12. CBC officers and the consultants have given further consideration to these representations. On balance it is considered that Conservation Area designation on the basis of the proposed boundaries would be justified and beneficial, with potential to preserve and enhance the historic and architectural interest of the area.
- 1.13. The proposal is considered to be justified in terms of **heritage significance** when assessed against nationally recognised criteria. Gossops Green represents one of the most architecturally successful of Crawley's original neighbourhood centres, as exhibited in the detailing and materials of the buildings, the relationship between buildings and open spaces, and the area's dramatic elevated setting, providing views of forested areas beyond the built up area to the south and west. The quality and interest of the neighbourhood parade and St Alban's Church are already recognised in the fact that these buildings are locally listed. We would also note that the designation of the Southgate Neighbourhood Centre Conservation Area in 2013 provides a positive precedent for the creation of a Conservation Area of this nature. This has helped maintain and enhance the character of the area, for example through ensuring a more visually suitable means of enclosure to the front garden at the Downsman pub.
- 1.14. Regarding questions of maintenance and upkeep: these are not directly relevant to the question of whether the area has sufficient heritage significance to merit Conservation Area status, although any impact on this issue arising from the proposed designation is likely to be positive. The preparation and adoption of a Conservation Area Statement for the area will introduce more detailed development guidance and management proposals, while the planning controls which come with designation should help to ensure that further changes preserve or enhance the character of the area.

## High Street Conservation Area

- 1.15. The proposed amended boundary to the High Street Conservation Area include an extension to the north across The Boulevard to include the grade II Listed 103 High Street, known as 'The Tree', which is the home of Crawley Museum, as supported by the consultants. At the southern end of the Conservation Area, meanwhile, the consultants did not support a separate suggestion that the Conservation Area be extended southwards to the railway. They further recommended the removal of St John's House and Gainsborough House, at the junction with Haslett Avenue West, from the Conservation Area, suggesting that these are out of scale with the rest of the area and include details which are out of keeping with the appearance of the older buildings. The proposed boundary removes St John's House but retains Gainsborough House within the Conservation Area, as it is considered that notwithstanding the points raised by the consultants the building has sufficient interest to justify leaving the current boundary in place at that location. The proposed boundary also reflects the removal of part of The Broad Walk, which would become part of the proposed new Queens Square and The Broadway Conservation Area, if adopted.

- 1.16. There were 5 consultation representations relating to the proposed boundary. Comments on the proposed northward extension were supportive. In addition representors made further comments as follows:
- Request for consideration of further northward extension to include the Grade II Listed 109 High Street, known as Boscobel, and additional areas of grass verge leading towards it;
  - Request for reconsideration of a southward extension to include the east side of the High Street south of Haslett Avenue West, notably 1-7 High Street;
  - Request that boundary changes are not implemented until the High Street Conservation Area Statement has been completed in draft form.
- 1.17. CBC officers and the consultants have given further consideration to these representations. On balance it is considered that the proposed boundary is most appropriate.
- 1.18. In respect of 109 High Street ('Boscobel'): while this is clearly a building of historic interest in its own right, the buildings between it and 103 High Street ('The Tree') are late twentieth century buildings of no particular historic or architectural significance. It is considered that the inclusion of these intervening buildings within the Conservation Area (as would be required in order to include no. 109) would weaken the special interest of the Conservation Area, while the fact that no. 103 is a Listed Building provides substantial protection in any case. The proposed boundary would include the grass verge immediately to the west of no. 109.
- 1.19. In respect of the buildings on the eastern side of the High Street further south: here likewise the buildings in question are separated from the proposed Conservation Area boundary by modern development, here in the form of Portland House, a large, four-storey office building, in a style bearing very little resemblance to the predominant character of the buildings in the Conservation Area. Introducing Portland House into the Conservation Area (as required in order to include 1-7 High Street) would significantly weaken the special interest of the Conservation Area.
- 1.20. Regarding the request to hold the changes in abeyance pending the preparation of a draft Conservation Area Statement: the importance of an updated Conservation Area Statement in helping to guide the council's approach to preserving and enhancing the character of the area is appreciated. At the same time it is considered that the council, having obtained consultant advice on the Conservation Area boundaries, should implement the recommended changes without additional delay unless there is any overriding objection to them in principle. This will help to ensure that the Conservation Area designation operates as effectively as possible, and avoids any unnecessary appearance of casting doubt on the validity of the consultants' findings in relation to the High Street or any other actual/proposed Conservation Area.

## **St Peter's Conservation Area**

- 1.21. A small boundary change is proposed, namely the addition of the Grade II listed 60-62 Ifield Road and the associated curtilage to the Conservation Area, as recommended by the consultants. These properties are currently immediately adjacent to the Conservation Area boundary.
- 1.22. There were 5 consultation responses concerning this proposal. The proposed extension was widely supported. The only additional comment was to suggest consideration of a further extension to include no. 64 Ifield Road.

- 1.23. Having given further consideration to the comments, CBC officers and the consultants consider that the extension to include 60-62 Ifield Road is appropriate but that 64 Ifield Road, a much more recent property, lacks sufficient historical or architectural interest to merit inclusion.

## Crawley Borough Council

### Report to Cabinet 2 November 2022

## Allocating Monies Collected Through CIL, Neighbourhood Improvement Strand

Report of the Head of Economy and Environment – PES/420

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### 1. Purpose

- 1.1. To provide Cabinet with a review of the collection and administration of Community Infrastructure Levy (CIL) funds and how they are allocated under the Neighbourhood Improvement Strand.
- 1.2. To seek Cabinet approval for proposed amendments to the allocation and governance of the CIL Neighbourhood Improvement Strand, subject to the outcome of a public engagement exercise.

### 2. Recommendations

- 2.1. The Cabinet is recommended to:
  - a. Approve the proposed amendments to the allocation and governance of the CIL Neighbourhood Improvement Strand monies set out in sections 6 and 7 of this report, subject to the outcome of a public engagement exercise.
  - b. Delegate authority to Head of Economy and Planning, in consultation with the Cabinet Member for Planning and Economic Development to undertake a public engagement exercise on the proposed amendments to the allocation and governance of CIL Neighbourhood Improvement Strand monies, as set out in sections 6 and 7 of this report.
  - c. Delegate authority to the Head of Economy and Planning, in consultation with the Cabinet Member for Planning and Economic Development, to implement any procedural modifications to the CIL Neighbourhood Improvement Strand, including any minor amendments in response to the public engagement exercise. (Generic Delegation 7 will be used to enact this recommendation).

### 3. Reasons for the Recommendations.

- 3.1. To unlock more CIL funds to invest in infrastructure which brings clear community benefits at neighbourhood level and to ensure best practice for the ongoing distribution of the Neighbourhood Improvement Strand CIL monies, in line with government regulations.

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## 4. Background

- 4.1. The Community Infrastructure Levy (CIL) is a charge which can be levied by local authorities on new development in their area through the local planning system. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. The CIL charge is based on a calculation related to £'s per m<sup>2</sup> of net additional floorspace. CIL was introduced by the Planning Act 2008 and is governed by the Community Infrastructure Levy Regulations 2010 (as amended). It took effect in Crawley on 17th August 2016.
- 4.2. Forecast CIL income in Crawley is based upon residential growth trajectories included within the submission draft of the Crawley Borough Council Local Plan 2022-2037 – the income being received by the Council once residential developments have commenced.
- 4.3. The CIL Regulations 2010 as amended, part 7 state that 15% of the total CIL contributions collected are to be allocated for spending in agreement with local communities – the Neighbourhood Improvement Strand. The remaining 85% of CIL contributions is for the Strategic Infrastructure Strand<sup>1</sup>.
- 4.4. In October 2017, Cabinet approved a crowdfunding model as the preferred option for the governance of the CIL Neighbourhood Improvement Strand, and also the implementation of a one year Crowdfunding pilot - report [PES/257](#) refers.
- 4.5. In March 2022, Cabinet approved the proposed CIL strategic infrastructure spend priorities presented in the Infrastructure Business Plan as a priority for delivery and the funding programme for the period 2020/21 to 2024/25 – report [PES/388](#) refers. Cabinet also approved the extension of the Crowdfunding pilot for a further year with the administration costs associated with the site being paid for from CIL contributions.

## 5. CIL – Neighbourhood Improvement Strand (NIS).

- 5.1. The CIL guidance states that if there is no parish or town council, *the charging authority will retain the levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding, crucially this consultation should be at the neighbourhood level. Charging authorities should set out clearly and transparently their approach to engaging with neighbourhoods. The law does not prescribe a specific process for agreeing how the neighbourhood portion should be spent.*
- 5.2. In 2018, utilising the NIS contributions, the council, created a new borough wide community fund called the Neighbourhood Improvement Fund and used a crowdfunding website, [Crowdfund Crawley](#), to distribute the fund. The use of the website enabled the council to comply with the CIL guidance referenced in 5.1. To date £124,501 has been raised - [Impact report](#).

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<sup>1</sup> The 'neighbourhood portion' increases to 25% of CIL receipts in areas where a Neighbourhood Plan is in place, but there are no Neighbourhood Plans currently existing or under preparation within Crawley



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- 5.3. As of September 2022, the total CIL NIS received from new development is £466,322 with £326,425 of those contributions received during the financial year 2021/22. To date Crawley Borough Council has distributed £25,395 of NIS funds received. Currently, the council is holding £440,927 in NIS contributions.
- 5.4. With a significant additional influx of CIL receipts over the past year, the need to unlock funds to invest in neighbourhood improvements, and a continued need for the Council to be confident of what funding streams are available to deliver its future capital programme, it is considered that a change in approach to the distribution of CIL NIS is appropriate.

## **6. CIL Neighbourhood Improvement Strand - Proposed Governance and Procedural amendments.**

- 6.1. It is proposed to implement a new “hybrid” model. The Neighbourhood Improvement Fund (see 5.2 above) would be retained to fund projects delivered by community organisations through the Crowdfunding web site. The remaining NIS contributions not committed to the Neighbourhood Improvement Fund would be used as a contribution to the delivery of a programme of neighbourhood improvement works identified as a priority by Crawley Borough Council, subject to public engagement.
- 6.2. It is therefore proposed to retain £75,000 from the CIL NIS, to maintain the Neighbourhood Improvement Fund with an annual contribution of £25,000, from the CIL NIS, until March 2025.
- 6.3. The continued year on year allocation of £25,000 to the Neighbourhood Improvement Fund will be subject to an annual review by the Cabinet to monitor the extent to which the CIL monies are being used and their delivery of neighbourhood improvements which bring community benefits. This review will take place in November 2023. .
- 6.4. The distribution method for the Neighbourhood Improvement Fund from April 2023 will be considered at the next annual review of CIL in March 2023.

## **7. Proposed Method to Prioritise Projects for the Council’s Programme of works funded by the CIL Neighbourhood Improvement Strand.**

- 7.1. The government’s CIL guidance states: *Where the charging authority retains the neighbourhood funding, they can use those funds on the wider range of spending that are open to local councils [regulation 59C](#).*
- 7.2. CIL guidance further states that: *In deciding what to spend the neighbourhood portion on, the charging authority and communities should consider such issues as the phasing of development, the costs of different projects, the prioritisation, delivery and phasing of projects, the amount of the levy that is expected to be retained in this way. They should also have regard to the infrastructure needs of the wider area. The charging authority and communities may also wish to consider appropriate linkages to the growth plans for the area and how neighbourhood levy spending might support these objectives.*

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7.3. In view of the above CIL guidance in 7.1 and 7.2, officers propose that the method for spend allocation should follow the same principles as those previously adopted when allocating spend within the CIL Strategic Infrastructure Strand. These principles are set out below:

- I) That project selection be based upon [Crawley's Infrastructure Delivery Schedule \(IDS\)](#), which identifies infrastructure required as a result of the growth forecasts indicated in the Local Plan.
- II) That as CIL's primary role is to fund infrastructure that addresses the cumulative impact of growth, resources be concentrated as a priority on the schemes identified in the IDS as being Critical to enabling growth; and those essential schemes, which score the highest against the agreed assessment criteria. [PES/257](#)

7.4. It is further proposed that the CIL Neighbourhood Improvement Strand collected be used to fund those infrastructure projects to be delivered at a neighbourhood level, i.e., projects where the impact is most likely to be felt within one neighbourhood.

7.5. The following two programmes within the Infrastructure Delivery Schedule have been identified amongst the highest scoring essential schemes in the IDS and to be delivered at a neighbourhood level.

- I) Unsupervised Play Investment Programme (UPIP) 2023/24 to 2030/31, for the provision and improvements to Play Areas (Type A, B & C) at multiple locations across the Borough.

The specific neighbourhood projects for the UPIP for 2023-24 and beyond to be part funded by the CIL Neighbourhood Improvement Strand, will be the subject of a future Cabinet report. Therefore, this report seeks Cabinet approval for the allocation of CIL Neighbourhood Improvement Strand monies to the Unsupervised Play Investment Programme as a whole.

- II) Programme to improve drainage on playing fields and football pitches at multiple locations across the Borough. The precise locations are to be determined and would be subject to a further report to Cabinet.

The above programmes are set out in Appendix A alongside other projects classed as essential which are more strategic in nature.

7.6. When allocating a contribution from the Neighbourhood Improvement Strand, consideration is also given to the level of urgency, repercussions, and associated risks (safety, partial/full closure) if additional funding is not secured to allow the project to proceed in a timely manner.

7.7. As identified in Appendix A, the Unsupervised Play Investment Programme achieved the highest score against the criteria, it is therefore proposed to allocate any NIS funds not allocated to the Neighbourhood Improvement Fund, in the first instance, to the Unsupervised Play Investment Programme.

7.8. Should the contribution amount required from the CIL Neighbourhood Improvement Strand for the above two schemes be reduced e.g., alternative

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funding streams identified – the selection will be amended, and the next highest scoring programme/ project in the IDS will be brought forward for consideration.

## **8. Community Engagement, subsequent delegation.**

- 8.1. In accordance with CIL guidance referred to in 5.1, officers propose to undertake a 4-week public engagement exercise to obtain feedback and to ensure there is sufficient support for the proposed allocation of the Neighbourhood Improvement Strand to the two schemes set out in Section 7 above. This exercise will involve Crawley Ward Councillors, the local community, and stakeholders.
- 8.2. Subject to the outcome of the public engagement exercise, it is proposed that Cabinet delegate authority to the Head of Economy and Planning, in consultation with the Cabinet Member for Planning and Economic Development, to implement the procedural amendments outlined in sections 6 and 7 of this report.
- 8.3. The precise locations for individual play infrastructure improvement projects from within the wider Unsupervised Play Infrastructure Programme will be brought forward seeking approval as part of a future report to the Cabinet. This report will be produced in due course and the intention is for there to be a further period of community engagement to seek feedback from residents, ward councillors and stakeholders on the individual play infrastructure schemes. The public consultation on the individual projects will be live for a minimum 3 weeks and a report produced at the end. The consultation process will include online/ paper surveys and drop-in sessions. Following the outcome of the public consultation, any necessary amendments, where applicable, will be made to the projects based in accordance with feedback received.

## **9. Financial Implications**

- 9.1. Total CIL Neighbourhood Improvement Strand (NIS) received by the Council as of August 2022: £440,927.
- 9.2. It is proposed that £75,000 be allocated to the Neighbourhood Improvement Fund, until 31<sup>st</sup> March 2025, subject to annual review by the Cabinet with the first review scheduled for November 2023. This will fund projects delivered by community organisations. Any NIS contributions not committed to the Neighbourhood Improvement Fund are proposed to be used as a contribution to a programme of works identified as a priority by Crawley Borough Council, as described in section 7, subject to community engagement.
- 9.3. After the retention (subject to annual review) of £75,000 to be allocated to The Neighbourhood Improvement Fund, there would remain up to £365,927 from contributions received to date to be allocated to the Unsupervised Play Investment Programme.

## **10. Legal Implications**

- 10.1. The legislation governing the development, adoption, and administration of a Community Infrastructure Levy (CIL) is contained within the Planning Act (2008) and the Community Infrastructure Levy Regulations 2010 (as amended). CIL charging took effect in Crawley following due process on 17th August 2016.

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- 10.2. CIL regulations state that 15% of the total CIL contributions collected are to be allocated for spending in agreement with local neighbourhoods where development is taking place. The government does not prescribe a specific process for how the neighbourhood improvement strand should be spent.

## 11. Equalities Implications

- 11.1. The Council must have due regard to its obligations under the Equality Act 2010 and for the public sector equality duty (“PSED”) under section 149 of the Equality Act 2010 in making its decisions and carrying out its functions. The equalities impact and/or the PSED will be addressed as and when CIL funded proposals are developed.
- 11.2. Specific to Crowdfund Crawley and the Neighbourhood Improvement Fund- Officers carried out an Equality Impact Assessment (EIA) and considered its duties under the PSED, for which the main finding was that the site is fully inclusive as it is open to everyone. The information collected by the Council from organisations applying for funding from Crowdfund Crawley includes their Governance, Constitution and Equal Opportunities policy. A copy of the EIA for Crowdfund Crawley can be found in Appendix D of report [PES/302](#)

## 12. Background Papers

Report to Cabinet 16 March 2022 PES/388 [Allocating Monies Collected Through CIL](#)

Report to Cabinet 24 November 2021 HCS/33 [Unsupervised Play Investment Programme](#)

Report to Cabinet 10 March 2021 PES/370 - [Annual Community Infrastructure Levy \(CIL\) Statement](#)

Report to Cabinet 11 March 2020 PES/335 - [Allocating Monies Collected the Through Community Infrastructure Levy – Infrastructure Business Plan 2020/21](#)

Report to Cabinet 6 February 2019 PES/302 - [Allocating Monies Collected Through Community Infrastructure Levy 2019/20](#)

Report to Cabinet 7 February 2018 PES/264 - [Allocating Monies Collected Through Community Infrastructure Levy - Infrastructure Business Plan and Governance.](#)

Report to Cabinet 4 October 2017 PES/257 – [Community Infrastructure Levy - Governance, Prioritisation and Spend Proposals.](#)

Report to Cabinet 29 June 2016 SHAP/54 - [Adoption of Crawley Community Infrastructure Levy \(CIL\)](#)

**Infrastructure Delivery Schedule (IDS)**

The Infrastructure Delivery Schedule forms an important part of the evidence base for implementing the Community Infrastructure Levy (CIL). The purpose of the IDS is to demonstrate that a funding gap exists. To identify a funding gap, the council must identify the total cost of infrastructure it wished to fund in whole or in part from CIL. This document builds upon the information set out in the Crawley Infrastructure Plan (published 2014) and includes the details of the infrastructure requirements identified by both the council and other service providers. The council have worked with a variety of infrastructure providers to determine known and expected costs of infrastructure as well as other sources of funding which may be available.

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Funding Sources Available	Funds Available	Potential Funding Gap	Lead Organisation	Score out of 400	Criteria Met
Unsupervised Play Investment Programme (UPIP) 2022/23 to 2032/33 Neighbourhood Provision, improvements to Play Areas - Type A, B & C	Open Space	Borough Wide	CBC Play Strategy	Essential	No	Short Term to Long Term	£ 1,925,500	S106 & CIL only (£324,794 S106 secured)	£ 324,794	£ 1,600,706	CBC	340	ABDGJK
A264/A2220/ Sullivan Drive roundabout improvement stage 2	Transport	Bewbush	West of Bewbush JAAP	Essential	No	Long Term	£ 3,300,000	S106, remainder TBC (£483,159 S106 secured)	£ 483,159	£ 2,816,841	WSCC	335	ABDGJL
Improving drainage on playing fields and football pitches	Open Space	Borough Wide	Current provision waterlogged and poor quality. (Crawley Playing Pitch Study 2013)	Essential	No	Short Term to Long Term	£ 394,000	CBC, Football Foundation, S106 & CIL (£51,000 S106 Secured)	£ 51,000	£ 343,000	CBC	330	ABDGJH
Improvements to Cycle Route Network. High quality, fully evaluated, connected whole route cycle and walking infrastructure schemes.	Transport Cycle	Borough Wide	Crawley Strategic Infrastructure Package (2017) WSCC.	Essential	Yes	Medium Term	£ 500,000	WSCC & Developer contributions	£ -	£ 500,000	WSCC	330	ABDFJKL
Crawley Avenue/London Road (Tushmore Roundabout)	Transport	Langley Green	WSCC feasibility study has identified an enhanced scheme for Tushmore roundabout	Essential	No	TBC	£ 1,746,000	TBC	£ 367,000	£ 1,379,000	WSCC	320	ABDGJKL
K2 Heat Network Phase 3	Decentralised Energy	Tilgate	To provide low heat to future development on land behind K2	Essential	No	Short Term	£ 250,000	CIL, WSCC, Sussex Energy Saving Partnership and government grants	£ -	£ 250,000	CBC	315	ABDGJK
Road Network Improvement – Peglar Way	Transport Road	West Green	To enable opportunity areas identified in the Crawley to be brought forward. Crawley Strategic Infrastructure Package (2017) WSCC.	Essential	No	Short Term	£ 5,100,000	WSCC, Coast to Capital LEP & developer contributions	£ -	£ 5,100,000	WSCC, CBC & LEP.	310	ABDGJL
Road Network Improvement- Station Road Gyratory	Transport Road	Northgate	To enable opportunity areas identified in the Crawley to be brought forward. Crawley Strategic Infrastructure Package (2017) WSCC.	Essential	No	Medium Term	£ 5,200,000	WSCC, Coast to Capital LEP & developer contributions	£ -	£ 5,200,000	WSCC & CBC.	245	ADGUKL
Manor Royal Heat Network A	Decentralised Energy	Northgate	To provide heat to buildings and residents in Manor Royal	Essential	No	TBC	£ 6,400,000	CIL, WSCC, Sussex Energy Saving Partnership and government grants	£ -	£ 6,400,000	CBC	240	ADGIJK
Manor Royal Heat Network B	Decentralised Energy	Northgate	To provide heat to buildings and residents in Manor Royal	Essential	No	TBC	£ 7,170,000	CIL, WSCC, Sussex Energy Saving Partnership and government grants	£ -	£ 7,170,000	CBC	240	ADGIJK
New Primary School of 2 form entry	Education	TBC	Current Schools nearing capacity Planning for School Places 2016	Essential	No	TBC	£10,600,000	CIL & Basic Need Grant	£ -	£ 10,600,000	WSCC	225	ADGIKL

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