

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

Gossops Green Neighbourhood Centre Conservation Area (proposed new CA)					
Ref No.	Respondent	Comments	Place Services response	CBC response	Recommendation
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 its 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 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.

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making the town centre an attractive location for investment.

Queens Square and The Broadway, Conservation Area

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).

35. The proposed conservation area at Queens Square and The Broadway is objected on the following grounds:

- 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.

- 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.

- 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

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.

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.

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.

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

		<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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Twentieth Century Society in a recent study supported and promoted by Historic England; Conservation Areas Project - Potential Conservation Areas Scoping Report, December 2017.

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.

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:

- Blackwater Lane
- Church Road
- Goffs Park Road
- Milton Mount Avenue
- Mount Close and Barn Wood
- Rusper Road

41. The Place Services Non-Designated Heritage Asset Review undertaken in December 2020, concluded that:

*“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.*”

Twentieth Century Society referred to, this states:

*‘...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.’*

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><i>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."</i></p> <p>42. 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.</p> <p>43. 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>The Review document referred to was considering a larger area. The same recommendation also states: '<i>....a more compact boundary which omits modern infill development and areas of unsympathetic change could be considered for ASLC designation through further assessment.'</i></p> <p>That 'further assessment' is set out in the ASLC Assessment document which found the smaller area to be worthy of Conservation Area status.</p> <p>As set out above we consider that the proposal is fully consistent with 1990 Act and the NPPF.</p>	
14	DMH Stallard on behalf of the Town Centre Business Improvement District	<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>	Designation of Gossops Green Neighbourhood Centre Conservation Area recommended (see map)

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.

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.

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.

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:

"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."  
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.

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.

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.

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.

Concerning the 2017 report by the Twentieth Century Society referred to, this states:  
*'...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.'*

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.

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.

Potential impact of Local Listing and Conservation Area designation

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.

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.

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'

Emerging Local Plan policies, all seek to support further growth, development and regeneration within the town centre:

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.

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.

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.

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>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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		<p>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.</p>		<p>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.</p>	
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>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).</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>
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>	<p>The initial assessment of Crawley New Town Centre (Appendix C1) looked at the possibility of designating part of</p>	<p>We note and appreciate the response. However, we do not feel that it provides substantive reasons</p>	<p>Designation of Queens Square and The Broadway</p>

		<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)

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.

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.

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.

**Report**

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.

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.

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

Proposed Conservation Area and Local Listing

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".

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".

Major Changes to the Layout and Character of Queens Square

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

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

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.

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

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).