

CRAWLEY BOROUGH LOCAL PLAN EXAMINATION

Crawley Borough Council Response to Inspector's
Matters, Issues and Questions

Matter 3: Housing
Issue 2: Housing Supply

February 2015



Issue 2: Whether the amount of housing development proposed represents the maximum available within the borough over the plan period, having regard to the constraints on land supply.

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CBC/004 Matter 3: Housing; Issue 2: Housing Land Supply

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3.4 Do the Strategic Housing Land Availability Assessment and the Urban Capacity Study provide a thorough examination of the potential for housing development within the plan area?

- 3.4.1 Crawley's development as a New Town, in addition to the influence of Gatwick Airport, has significant implications for the future of the town in terms of finding appropriate sites for new development to meet anticipated growth needs. Crawley's development as a series of comprehensively planned neighbourhoods, many of which have accommodated a significant amount of infill housing over the last decade, means that the capacity of the built up area to accommodate further housing is limited. Objectively Assessed Needs predict that a further 9,045 homes will be needed by 2030¹. With the capacity of the built up area already limited, this places pressure on some of the key features that define Crawley's unique character including its biodiversity, heritage and open space. Therefore, it is important that the locally distinctive features that contribute to the town's sense of place and the quality of life of its residents are recognised, protected and enhanced where possible.
- 3.4.2 This required an appropriate balance to be reached between the conflicting demands to meet housing, employment and social infrastructure, whilst protecting the town's environmental, heritage and unique New Town features. Reflecting this, the council has undertaken a number of studies, including: a Built-Up Area Boundary Review²; Landscape Character Assessment³; Open Space, Sport and Recreation Study⁴; Strategic Housing Land Availability Assessment⁵ (SHLAA); and Urban Capacity Study⁶ (UCS), to demonstrate that the development proposed in the Crawley Borough Local Plan (CBLP) represents the maximum available in the borough, having regard to constraints on land supply. The small size of the borough has meant comprehensive assessments across the whole area have been possible.
- 3.4.3 The SHLAA undertaken by the council forms a key part of the evidence base for the CBLP. The primary role of the SHLAA⁷ is to identify sites and broad locations for housing development. Each site is then assessed on its housing potential, whether the site is suitable, available and achievable as well as the likely timeframe for development. The methodology applied by the council in preparing the SHLAA is set out in Topic Paper 3: Housing Land Supply⁸ and accords with the NPPF⁹ and the

¹ LP001d: Schedule of Further Proposed Modifications to the Submission Local Plan (September 2014), MM067—MM069; and MM086—MM089 (February 2015) CBC; as set out in CBC/003: Council's Response to Inspector's Matters, Issues and Questions: Matter 3 Housing; Issue 1 Objectively Assessed Housing Needs (2015) CBC

² LP056: Built-Up Area Boundary Review (2012) CBC

³ LP057: Crawley Landscape Character Assessment (2012) CBC

⁴ LP115: Crawley Open Space, Sport and Recreation Study (2013) JPC

⁵ LP079: Crawley Strategic Housing Land Availability Assessment (2014) CBC

⁶ LP090: Crawley Urban Capacity Study (2013) CBC

⁷ LP079: Strategic Housing Land Availability Assessment (2014) CBC

⁸ LP012: Topic Paper 3: Housing Land Supply (2014) CBC

⁹ National Planning Policy Framework, para 159 (2012) DCLG

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PPG¹⁰. All sites submitted to the council or identified through the UCS have been formally assessed and categorised according to their suitability for housing development. Therefore, the SHLAA provides a sound and thorough examination of the potential for housing development in the borough.

- 3.4.4 The town centre represents a large opportunity for brownfield residential development which is highly sustainable. Four key opportunity sites have been identified in Policies EC6 and H2 and four mixed-use allocations are also identified in Policy EC6. It is likely that residential will form part of the mix on some of the sites, and others are anticipated to come forward in the Plan period, so the town centre has been identified as a Broad Location for development in Policy H2. Also, the high proportion of 'Grade B' office stock within the town centre, which is generally underused and older as indicated in the Economic Growth Assessment¹¹ (EGA), provides an opportunity for the conversion of office to residential development through Prior Approval (PA3) or formal planning applications. The council's monitoring of PA3 applications (as set out in Appendix A) demonstrates that Prior Approvals are contributing to the council's five year housing land supply and so this has been factored into the council's unidentified 'windfall' allowance of 277 dwellings over the first five years of the Plan period.
- 3.4.5 As part of the SHLAA process, the council undertook three 'calls for sites' which provided opportunities for sites to be nominated for their housing potential. The early engagement stages of consultation¹² also provided further opportunities for developers, landowners and other stakeholders to submit sites to the council. All sites being promoted were assessed and incorporated into the SHLAA¹³.
- 3.4.6 As the number of sites submitted during the 'call for sites' and Local Plan consultation stages was limited, the council undertook an UCS¹⁴ in 2012; updated in 2013. The methodology applied in preparing the UCS is summarised in Topic Paper 3: Housing Land Supply¹⁵, with further details in the UCS¹⁶ report. The purpose of this assessment was to identify potential housing sites and broad locations in each of the neighbourhoods of Crawley through an initial desktop exercise, using Ordnance Survey Maps and aerial photography. The findings can be found in the Urban Capacity Study. As a result, a number of sites were identified which merited further investigation; site visits were then undertaken to ascertain their suitability for potential development.
- 3.4.7 Taking all of the constraints to land supply into account, the council considers that it has maximised the potential for housing development in the borough by undertaking a robust SHLAA and UCS and in doing so has positively sought to meet housing needs

¹⁰ Planning Practice Guidance, Housing and Economic Land Availability Assessment (2014) DCLG

¹¹ LP062: Economic Growth Assessment for the Northern West Sussex Area (2014) NLP

¹² Issues and Options Consultation (January to March 2012); the Preferred Strategy Consultation (October to December 2012); and the Preferred Strategy Additional Sites Consultation (2013)

¹³ LP079: Crawley Strategic Housing Land Availability Assessment (2014) CBC

¹⁴ LP090: Crawley Urban Capacity Study (2013) CBC

¹⁵ LP012: Topic Paper 3: Housing Land Supply (2014) CBC

¹⁶ LP090: Crawley Urban Capacity Study, Appendix A (2013) CBC

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in accordance with the presumption in favour of sustainable development. Therefore, the housing requirement in Policy H1 of the Local Plan¹⁷ for 5,000 dwellings over the Plan period (2015-2030) represents a robust 'supply led' requirement which reflects the compact nature of the borough, its limited land availability, the high housing need and the significant environmental and airport noise and safeguarding constraints.

¹⁷ LP001a: Crawley Submission Modifications Draft Local Plan, P.76 (November 2014) CBC

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3.5 Is the allowance for unidentified 'windfall' sites justified and based on robust evidence? Is it realistic to suggest that over half the supply will come from office to residential prior approvals?

- 3.5.1 A windfall site is defined by the NPPF glossary¹⁸ as a site that has not been specifically identified as available in the Local Plan process; most typically a previously developed site that has unexpectedly become available.
- 3.5.2 The NPPF¹⁹ states that LPAs can make an allowance for windfall sites in the five-year land supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. This allowance should be realistic, having regard to the SHLAA, historic windfall delivery rates and expected trends, but excluding residential gardens.
- 3.5.3 In order to comply with the NPPF, an analysis of past and future windfall trends has been undertaken to establish that the allowance for unidentified windfall sites in Crawley is justified and based on robust evidence. Topic Paper 3: Housing Land Supply²⁰ provides a summary of the approach taken by the council to identifying a windfall allowance, with detailed and technical evidence provided in the council's Windfall Allowance evidence document²¹.
- 3.5.4 Over recent years, several large windfall sites have received planning permission and been built. This includes land at St Wilfreds Catholic School, Old Horsham Rd (99 dwellings) and the former Crawley Leisure Centre (829 dwellings). However, with a thorough examination of the potential for housing development undertaken through the SHLAA²² and the UCS²³, it is unlikely that many large unidentified windfall sites of over 30 dwellings will come forward in the initial part of the Plan period. However, a number of smaller windfalls have been delivered on brownfield sites over the past five years, these have been in the older neighbourhoods of Three Bridges, Southgate and Northgate with the redevelopment of older residential dwellings or the demolition and construction of new dwellings, it is anticipated these small-scale windfalls will continue over the Plan period.
- 3.5.5 Table 3.1, below, provides the windfall site components anticipated for the first five years of the Plan, reflecting both historical trends and the future provision of housing within the borough. It shows that is compiled from residential developments of 5 dwellings and below, unidentified planning permissions between 6 and 29 dwellings, and a portion of Prior Approvals for conversions from office to residential. This is considered to be a minimum figure, and in all likelihood, a number of residential garden sites are still likely to come forward as the housing market improves that cannot be included within this analysis.

¹⁸ National Planning Policy Framework, Appendix 2: Glossary p.157 (2012) DCLG

¹⁹ National Planning Policy Framework, para. 48 (2012) DCLG

²⁰ LP012: Topic Paper 3: Housing Land Supply, p.11 (2014) CBC

²¹ LP092: Establishing a Windfall Allowance for the Local Plan Period 2015-30 (2014) CBC

²² LP079: Strategic Housing Land Availability Assessment (2014) CBC

²³ LP090: Crawley Urban Capacity Study (2013) CBC

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Table 3.1: Windfall Site Components, Years 1-5²⁴

Extant Planning Permission (76)	107
Historic Delivery (31)	
Small Sites (< 5 dwellings)	25
Consented Prior Approvals	145 (50% discount)
TOTAL	277

- 3.5.6 The table above includes a figure of 145 dwellings for the permitted change of use from office to new residential. This is a 50% discount on the number of approvals as of September 2014, allowing for non-implementation. A total of 18 applications for Prior Approval have now received consent in Crawley (504 total net dwellings), with four awaiting a decision (Appendix A). This amounts to a total of 620 dwellings. Out of the 18 schemes which have been approved, two are now complete and occupied, with four commenced. Therefore, the windfall figure of 277 dwellings over years 1-5 in the CBLP is a conservative assumption and it is likely that the council will exceed this figure as shown by Appendix A. This data demonstrates the likelihood of Prior Approval developments contributing to over half of the council's windfall allowance in the first five years of the Local Plan.
- 3.5.7 Even if this permitted development right is removed, there remains a significant amount of older, Grade B office stock, particularly in the town centre (as highlighted in the EGA²⁵) which will continue to provide an attractive opportunity for conversion to residential in a highly sustainable location. Such conversion or redevelopment is likely to be incentivised by the Vacant Building Credit whereby there is no requirement for affordable housing. Therefore, it is considered likely that such windfalls will continue to come forward in the latter 10 years of the Plan period. The discount of 50% for non-implementation of the consented prior approvals also means it is probable that there will be a significant front-loading of windfall delivery, exceeding 55dpa in the first 5 years of the Plan period, so it is reasonable to distribute these figures more evenly through the 15-year period. Finally, the evidence from past trends suggests that windfall completions on very small sites and 6-29 dwelling development sites will continue beyond the first five years in other locations in Crawley. This is particularly the case for small sites under the 10 dwelling threshold where development is now likely to be incentivised by the removal of the affordable housing and tariff-style S106 agreement obligations requirement. There may also be larger unidentified sites coming forward in the late Plan period as buildings currently occupied may become vacant in latter years. The council, therefore, considers it appropriate to include the same allowance for years 6-15 (2020-30) of the Local Plan. This gives an overall allowance for unidentified windfalls

²⁴ LP092: Establishing a Windfall Allowance for the Local Plan Period 2015-2030, Table 4, paras 6.2-6.3, p9 (2014) CBC

²⁵ LP062: Northern West Sussex Economic Growth Assessment, para 8.15, p140 (2014) NLP

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of 825 dwellings over the Plan period 2015-30 which the council considers to be justified and based on robust evidence.

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3.6 Are the housing sites and broad locations identified in policy H2 suitable for housing development? Has their availability and viability been robustly assessed? Are these sites capable of delivering the stated number of houses over the plan period?

- 3.6.1 Policy H2: Key Housing Sites²⁶ (2014) demonstrates how the provision of a minimum of 5,000 homes will be delivered over the Local Plan period. The sites identified within Policy H2 have been identified as key housing sites and allocated on the Local Plan Map²⁷ (2014). This comprises 22 sites with a capacity of 30+ dwellings, amounting to a net capacity of 3,531 dwellings. These sites are considered as critical to the delivery of future housing in Crawley and have been identified as being either 'deliverable'²⁸ within years 1-5 of the plan (2015/16-2019/20) or 'developable'²⁹ in years 6-10 (2020/21-2024/25) as shown in the Housing Trajectory³⁰(2014). Please see Appendix B for the latest position on all the key housing sites in Policy H2. Policy H2 also identifies three broad locations for housing development in years 6-10 and years 11-15, land within the Town Centre (outside of Town Centre Opportunity Sites), Forge Wood Residual Land and Land East of London Road with a net capacity of 477 dwellings.
- 3.6.2 In accordance with the NPPF³¹ and NPPG³², the council has prepared a robust SHLAA³³ (2014) to establish realistic assumptions about the availability, suitability and achievability, including the viability, of development to ensure that a minimum of 5,000 dwellings can be delivered over the plan period. This assessment has then been used to prepare the council's Housing Trajectory which illustrates the anticipated delivery rate of dwellings which identifies: deliverable sites (Years 1-5) with an additional 5% buffer; developable sites (Years 6-10); and Broad Locations (Years 6-10 and 11-15).
- 3.6.3 'Deliverable' sites in Policy H2 are considered suitable, available and achievable now and have been included in the council's five year land supply as 'deliverable' sites (Category C of the SHLAA). This represents sites with extant planning permission or those with a firm commitment from the developer/landowner to bring the site forward. Any constraints or impacts to infrastructure arising from the development, particularly highways/access, have already been identified and can be resolved, and many proposals are at the planning application stage.

²⁶ LP001a: Crawley Submission Modifications Draft Local Plan (November 2014) CBC

²⁷ LP002a: Crawley Local Plan Map Modifications (November 2014) CBC

²⁸ To be considered 'deliverable' sites should be available now, offer a suitable location for housing development now and be achievable with a realistic prospect that housing will be delivered within the first five years and be viable. NPPF (2012) DCLG

²⁹ To be considered 'developable' sites should be in a suitable location for housing development, with a reasonable prospect of availability and could be viably developed at the point envisaged. NPPF (2012) DCLG

³⁰ LP080: Crawley Housing Trajectory (September 2014) CBC

³¹ National Planning Framework (2012) DCLG

³² National Planning Practice Guidance, Para 159 (2014) DCLG

³³ Strategic Housing Land Availability Assessment (2014) CBC

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- 3.6.4 WSCC highways department have recently assessed all of the key housing sites listed in Policy H2 and have concluded that there are no insurmountable highways and access issues that would hinder the deliverability of these sites for housing development within years 1-5 or years 6-10. Transport assessments would be required for many of the sites, carried out at planning application stage.
- 3.6.5 Seven 'deliverable' sites identified in Policy H2 have extant planning permission, most notably the new neighbourhood at Forge Wood for 1,900 dwellings which forms a large proportion of the borough's housing land supply over years 1-12 of the Plan period and where development has commenced. Therefore, with planning permission already granted, these sites are considered to be suitable, available and achievable and so 'deliverable'.
- 3.6.6 To ensure that sites in Policy H2 are achievable, a CIL, SHLAA and Affordable Housing Viability Assessment was undertaken in 2013³⁴ with a Viability Update in 2015³⁵. Through these studies, the council considers that the viability of sites in Policy H2 has been robustly assessed in line with the NPPF³⁶ and has accounted for the cost impact of all relevant Local Plan policies, the impact of CIL and affordable housing delivery, whilst ensuring a competitive return to both the landowner and developer.
- 3.6.7 The 2013 viability testing demonstrated that, in general terms, residential developments in Crawley are viable and can accommodate reasonable levels of CIL with an affordable housing assumption of 40%. However, a number of small brownfield sites indicated potential viability issues.
- 3.6.8 In February 2015 an update to the study was commissioned in order to take account of changes in market conditions which have shown improvement and government legislation (affordable housing thresholds, 2014) along with representations made to the Local Plan during its statutory stage of consultation. The assumption of 40% affordable housing plus a nominal 10% low cost provision as a 'worst case' viability position. On review of the SHLAA assessments, it was determined that a standard housing mix may not be appropriate for small, urban, brownfield sites, which are more likely to yield apartments. The Viability Update (2015) re-assessed these sites accordingly. Taking into account the recommended residential CIL rate of £100 per sqm, an assumption of 40% affordable housing plus 10% low cost and other policy requirements in the Local Plan which may add to the cost of development, the study concluded that all sites in Policy H2 demonstrated positive viability and so were achievable (Appendix C).
- 3.6.9 'Developable' sites identified in Policy H2 are considered suitable for housing development, with a reasonable prospect of becoming available in the future and will form part of the council's housing land supply for years 6-10 of the Plan period. This also includes those sites identified as Broad Locations.

³⁴ LP008: Crawley CIL, SHLAA and Affordable Housing Viability Assessment (2013) NCS

³⁵ LP008b: Crawley CIL, SHLAA and Affordable Housing Viability Assessment (2015) NCS

³⁶ National Planning Policy Framework, para. 173-177 (2012) DCLG

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- 3.6.10 Over the course of the Local Plan process, the council has actively engaged with key stakeholders, infrastructure providers, landowners and developers to ensure that sites identified in Policy H2 of the Local Plan are suitable, available and achievable and can be delivered in line with the council's Housing Trajectory. In order to ensure that sites identified in Policy H2 are delivered in line with the Housing Trajectory (2014) the council will maintain this dialogue.
- 3.6.11 Categories C-F of the SHLAA provide a detailed assessment of each individual site in Policy H2, with each table explaining the site's suitability, availability and achievability which demonstrates whether they are either deliverable or developable. Therefore, all sites identified in Policy H2 have been thoroughly examined through the SHLAA and are capable of delivering the minimum numbers of dwellings set out in the Policy, as a contribution towards the total anticipated 5,000 dwellings over the Plan period in line with council's Housing Trajectory³⁷ and estimated levels of windfalls. Appendix B sets out the latest position for all sites in Policy H2, demonstrating their deliverability over the Plan period.

Individual sites

(a) Forge Wood, Pound Hill

- 3.6a.1 The site is allocated for 1,900 dwellings, with outline consent, having been approved by the Secretary of State in 2011 and constitutes a large proportion of the borough's housing supply over the Plan period (years 1- 12) with completion anticipated in 2026/27. Persimmon Homes and Taylor Wimpey, working in partnership with the council and the HCA as major landowners in the area, are committed to bringing the site forward over the Plan period. Appendix D sets out the very latest trajectory from the developer consortium (February 2015) showing delivery in the early years slightly ahead of the trajectory in the submission CBLP Housing Trajectory³⁸.
- 3.6a.2 Phase 1a of the neighbourhood has detailed planning consent with construction of the first 215 houses underway. Phase 1c (39 dwellings) has detailed consent and the application for Phase 1b (43 units) has been submitted. Discussions are already underway about the next main phase of development.

(b) Ifield Community College (ICC), Ifield

- 3.6b.1 This site is allocated for 125 dwellings having come forward when ICC relocated the school and released some playing fields for development. Barratt Homes have now secured the site and are committed to bringing the site forward in years 1-5. The council is currently undertaking detailed pre application discussions with them on a revised scheme for approximately 200 dwellings with both market and affordable housing proposed. Barratts are publicising their public consultation to be held in early March before a new planning application is submitted to the council.

³⁷ LP080: Crawley Housing Trajectory (2014) CBC

³⁸ LP080: Crawley Housing Trajectory (2014) CBC

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3.6b.2 The site was allocated in the Core Strategy (2008) as a Strategic Housing Development Opportunity, developable before 2016. Planning permission (CR/2006/0339/OUT) was granted in 2006 for a mixed use development comprising of 170 dwellings, a doctors surgery, respite care centre and residential care home, establishing the principle of residential development. The doctors surgery has been implemented (CR/2008/0466/ARM). Highways and access issues have been raised by WSCC with the access from Lady Margaret Road previously proving controversial, although it was approved. The developer is already working with WSCC in order to resolve these issues.

(c) Tinsley Lane, Three Bridges

3.6c.1 Tinsley Lane Playing fields are suitable for a housing and open space development as detailed in the Housing Supply Topic Paper³⁹ using the council's evidence base documents⁴⁰. The site is allocated for 138 dwellings and the provision of open space and the relocation of Oakwood Football Club to the north of the site with enhanced sport facilities and improved access.

3.6c.2 The site has been promoted for development over a number of years and was a provisional allocation in the adopted Core Strategy (2008). However, due to uncertainties over deliverability at that particular time, the site was removed. There are a number of constraints on the site including access, retention of sports provision/provision of open space, air quality, drainage and the compatibility of residential use with the Goods Yard which is a safeguarded minerals site. However, the landowner (HCA), in partnership with the council, has undertaken a significant amount of work to demonstrate that the site is suitable for residential development and that issues surrounding the provision of open space, drainage, highways/access, noise and air quality can be overcome. This has included a Sports and Recreation Space Assessment, a detailed Transport Assessment including Hazlewick Interchange, a drainage report, a Noise Assessment and an Air Quality Assessment.

3.6c.3 Through the transport assessment, highways and access issues have been addressed and through consultation with WSCC, the general principle of development is considered acceptable in highway terms. There will be further work needed for the planning application. The noise assessment concluded that the area of the site proposed for development was suitable for residential development and through appropriate design, construction and layout, the houses most likely to be affected by noise from the goods yard could be protected. The drainage capacity of the site has also been assessed. The findings of the study concluded that Thames Water would accept in principle a proposed development of 70-100 dwellings. However, through further discussions with Thames Water it is expected that capacity for additional dwellings could be accommodated and dealt with at the pre application/application stage. The southern edge of the site falls within an Air Quality Management Area (AGMA) defined by the council which has recently been subject to a review. This has

³⁹ LP012: Topic Paper 3 Housing Land Supply (2014) CBC

⁴⁰ LP115: Crawley Open Space, Sport and Recreation Study (2013) JPC Strategic Planning & Leisure, Leisure and the Environment; and LP116: A Playing Pitch Study for Crawley (2013) Leisure and the Environment.

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led to a revised layout of the scheme with no development proposed within the AQMA. At the request of the council, the landowner commissioned an air quality assessment to analyse the impact of the residential development at the site. Results of the study demonstrated that the proposed development would be acceptable in terms of air quality. Further details of all the assessments undertaken can be found in Appendix 1-8 of the HCA's representation (REP/079) to the Local Plan's statutory consultation in September 2014.

- 3.6c.4 As set out in the Housing Supply Topic Paper⁴¹, the acceptability of the site for development in terms of open space is dependent on the relocation of Oakwood Football Club and both on- and off-site provision of open space, in line with the approach set out in the NPPF⁴²; relocation of the sports facilities, opening up private land for public use and on-site provision of open space to meet local needs. The HCA proposals are broadly in line with the recommendations set out in the topic paper. Whilst the replacement football pitch provision is not quite like-for-like in size, the council considers that on balance, the HCA proposals create an improved provision of open space to better meet the needs of the Tinsley Lane community and population of Crawley as a whole. This is largely due to a change in the mix of open spaces, private land becoming publicly accessible and new/enhanced facilities. The proposed provision is summarised in Appendix E. The approach to replacement facilities has been discussed between the football club and the HCA (see Appendix F).
- 3.6.c.5 All of these assessments demonstrate that, with appropriate mitigation, design/layout and the provision of open space, the site is deliverable in years 1-5 of the CBLP.

(d) Former TSB Site, Russell Way, Three Bridges

- 3.6d.1 The site is allocated in Policy H2 for 40 dwellings⁴³. The site is located in a main employment area, an area identified for employment uses identified in the Local Plan. As acknowledged in the SHLAA, there is potential for the site to come forward as part of a wider mixed use scheme, incorporating land to the west, which would provide an element of replacement employment floorspace.
- 3.6d.2 A planning application (CR/2005/0812/FUL) for 270 dwellings was approved on appeal in 2006, this also included land to the west. The applicant applied for an extension to this in 2010 (CR/2010/0313/FUL), but this was withdrawn at appeal, having been refused on design and scale grounds as the proposed development would cause harm to the residential environment of nearby properties by virtue of its scale, bulk and impact on privacy that would not be outweighed by the benefits of the increase to housing supply provided by the development. However, the principle for appropriate residential development and the loss of employment land on the site

⁴¹ LP012: Topic Paper 3 Housing Land Supply, Appendix B (2014) CBC

⁴² National Planning Policy Framework, para 74 (2012) DCLG

⁴³ LP001a Crawley Submission Modifications Draft Local Plan (November 2014) CBC

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is already justified based on the appeal decision in 2006 and satisfies the requirements in Policy EC2.

3.6d.3 The site density proposed in the Local Plan of 40 dwellings, represents a minimum figure based on a site capacity assessment, which could be exceeded. However, this would be decided at the planning application stage.

3.6.4 The landowner is committed to bringing the site forward, which is demonstrated in their response to the Local Plan's statutory consultation⁴⁴ by giving support for its identification as a 'deliverable' site in Policy H2.

(e) Breezehurst Drive Playing Fields, Bewbush

3.6e.1 The site is allocated for 65 dwellings and is identified as a developable site for housing and open space. The site is currently used as a playing field and was identified, following an initial assessment of the council's playing fields usage and demand, as surplus, together with the adjacent site at Skelmersdale Walk⁴⁵. The combined sites were proposed for development through the Additional Sites Consultation. Two options were suggested – one for the whole site to be developed for 200 dwellings and one for a mixed development of 100 dwellings and enhanced open space provision. Following significant local objections demonstrating the importance of the open space to the local population, and a further assessment carried out into the open space needs of the neighbourhood in relation to the increase of population created by the new dwellings themselves, the total development site area was reduced to exclude the Skelmersdale Walk playing fields. It is anticipated that, subject to design, layout and open space considerations, housing would be concentrated on the area of the site which adjoins the existing development on Breezehurst Drive, currently under construction, and the remaining half of the playing fields site would be enhanced for sport pitch provision. However, to ensure the best design, layout and scheme can be proposed the entire site is allocated for open space and housing, with some detail provided in the Reasoned Justification to the Policy, in relation to the open space requirements⁴⁶.

3.6e.2 The loss of open space to housing has been justified through the council's Open Space Assessment⁴⁷ and site specific open space assessment⁴⁸ of Breezehurst Drive Playing Fields. The development of this site provides an opportunity to reduce the provision of some types of underused or poorer quality open space in order to meet housing need, and to provide new and/or improved open space as part of the development which will ensure that open space is more useable and popular with residents.

⁴⁴ Regulation 19 Consultation: 1 September – 13 October 2014

⁴⁵ LP115: Crawley Open Space, Sport and Recreation Study, page 70 (2013), JPC Strategic Planning & Leisure, Leisure and the Environment.

⁴⁶ LP001: Crawley Borough Local Plan, para 6.47, p79 (September 2014) CBC

⁴⁷ LP115: Crawley Open Space, Sport and Recreation Study (2013), JPC Strategic Planning & Leisure, Leisure and the Environment.

⁴⁸ LP012: Topic Paper 3 Housing Land Supply, p40-50 (2014) CBC

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3.6f.3 This is a council-owned site which will ensure enhanced and appropriate open space is provided. Topic Paper 3 Housing Land Supply⁴⁹ also sets out the open space requirements that would need to be met as part of a planning application. The council is committed to bringing the site forward over years 6-10 of the Plan period. See Appendix G for detailed response to loss of open space objections.

(f) Henty Close, Bewbush

3.6f.1 The site is allocated for 24 dwellings and is identified as a 'developable' site for years 6-10. The site is a small part of a large recreation ground and includes a play area. The whole recreation ground (Bewbush West Playing Fields) was identified for its development potential following an initial assessment of the council's playing fields usage and demand⁵⁰. The site was then proposed for its development potential of 60 dwellings through the Additional Sites Consultation. However, after major concerns about the importance of the playing fields to the local community were expressed, the council reduced the number of the houses on the site to 48 and focused these on two small play area sites to the north and south of the playing fields. Concerns continued to be expressed that the northern area is important to the local community and should be retained as open space. In response to this, the council removed the northern element (west of Gemini Close). This reduced the total number of dwellings from 48 to 24 confining the proposed housing development to the southern corner of the recreation ground adjacent to the proposed route into the future neighbourhood of Kilnwood Vale. The proposed housing development ensures the retention of the two sports pitches and a pavilion on the Bewbush West playing fields, whilst offering opportunities to enhance links between the new neighbourhood at Kilnwood Vale and Bewbush West and also provides natural surveillance to the key bus and pedestrian/cycle route into the new Kilnwood Vale neighbourhood.

3.6f.2 A detailed site specific open space assessment of Land West of Henty Close is contained in Topic Paper 3 – Housing Supply⁵¹. The play area is not surplus to requirements, and will therefore need to be replaced nearby on available public open space in council-ownership⁵².

3.6f.3 This is a council-owned site and the council is committed to bringing the site forward for housing development in years 6-10 of the Plan.

(g) Steers Lane and Heathy Farm (Forge Wood residual areas)

3.6g.1 These two separate sites form part of the North East Sector allocation in the adopted Core Strategy⁵³, but are outside the land granted permission for the new Forge Wood neighbourhood. Whilst they are both considered appropriate for housing

⁴⁹ LP012: Topic Paper 3 Housing Land Supply, p44 (2014) CBC

⁵⁰ LP115: Crawley Open Space, Sport and Recreation Study, page 70 (2013), JPC Strategic Planning & Leisure, Leisure and the Environment.

⁵¹ LP012: Topic Paper 3 Housing Land Supply, Page 40-50 (2014) CBC

⁵² LP012: Topic Paper 3 Housing Land Supply, Page 44 (2014) CBC

⁵³ LP034: Crawley Borough Council Core Strategy (2008) CBC

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development, the timing of their delivery and their potential capacity, when considered against site constraints, is uncertain.

- 3.6g.2 The council is prioritising delivery of the 1,900 homes in the Forge Wood neighbourhood and, therefore, at this stage, neither of these additional sites can come forward without liaison with the Forge Wood Consortium. This is particularly because of access requirements as delivery of new or improved road junctions is closely tied to the phasing of development in the neighbourhood's planning conditions. Any additional development in the vicinity of these junctions will affect their capacity and potentially undermine the delivery of the wider neighbourhood. In pre-application discussions with the landowners of both sites, the council has emphasised the need for liaison with the Consortium, but it is believed this has not yet been undertaken.
- 3.6g.3 The 'broad location' designation in the Plan is considered to be appropriate, as it acknowledges the potential for these additional sites to form part of the later stages of the new Forge Wood neighbourhood, but this must be carried out in such a way to ensure it is not harmful to the successful phased delivery of the wider neighbourhood. Whilst the broad location allocation does not restrict a development from coming forward sooner, at this stage the sites' delivery in years 11-15 of the Plan period is considered appropriate and realistic. A further consideration for Steers Lane relates to the government decision on the future of Gatwick Airport, as the capacity of the site could be increased in the eventuality of a single-runway with safeguarding removed.

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3.7 Are there potential housing sites not included within policy H2 which satisfy the suitable, available and achievable tests of NPPF? Has the potential of the town centre, open spaces and the urban fringe been fully explored?

- 3.7.1 The council believes it has done everything it can to maximise the capacity of the borough to accommodate residential development over the plan period and this is fully evidenced in Topic Paper 3: Housing Land Supply⁵⁴. The thorough UCS and SHLAA undertaken by the council and updated over the course of the Local Plan process demonstrates that the council has positively sought to meet the housing needs of the area and explored every opportunity for housing development within the borough.
- 3.7.2 The SHLAA has assessed the suitability, availability and achievability of all sites within the borough for development in accordance with the NPPF. The methodology applied by the council in preparing the SHLAA is considered to be a sound approach and, therefore, promoted housing sites of 30+ dwellings which are not included within Policy H2 do not meet the suitable, available and achievable tests of the NPPF now and are not considered either deliverable or developable over the Plan period. These sites have been included in either SHLAA Category I (sites which are suitable but currently undeliverable) or Category J (sites which are unsuitable for development). The windfall allowance recognises unidentified sites are likely to come forward and these will be positively considered.
- 3.7.3 The potential of the town centre as a highly sustainable location for residential development is fully recognised as detailed work with landowners and developers means the council has a good understanding of redevelopment opportunities, particularly vacant or underused buildings or sites. Therefore, over 1,060 dwellings are allocated for residential development in the town centre, as shown in Table 3.2 below. The Housing Trajectory's windfall allowance also includes a proportion for prior approvals and/or conversion/redevelopment, and much of this is anticipated to come forward in the town centre. It is, therefore, considered that, whilst the figures are minimum figures, allowing for some sites to deliver more dwellings, the potential of the town centre for housing has been fully explored.

Table 3.2: Town Centre Residential Allocations

Site	Allocation	Number of dwellings
Town Centre Broad Location	Policy H2	156
Key Opportunity Sites	Policy EC6	499
Southern Counties	Policy H2	218
Fairfield House	Policy H2	93

⁵⁴ LP012: Topic Paper 3 Housing Land Supply (2014) CBC

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Site	Allocation	Number of dwellings
15-29 Broadway Upper Floors	Policy H2	57
Kilnmead	Policy H2	40
Total:		1,063

- 3.7.4 In order to ensure that the potential of the Urban Fringe was fully explored, a Built-Up Area Boundary Review⁵⁵ was undertaken in October 2012. The study concluded that some areas of land currently related more to the urban environment of Crawley rather than the surrounding countryside and so could be included as part of the built up area. This included: Thomas Bennett College and K2 Leisure Centre, Breezehurst Drive Playing Fields, West of Bewbush and Cherry Lane Playing Fields. These sites were then assessed in terms of their suitability, availability and achievability for housing, with two now included in Policy H2 (Breezehurst Drive Playing Fields, Bewbush and Henty Close, Bewbush).
- 3.7.5 The Built-Up Area Boundary Review also identified the areas immediately adjacent to the urban area that more closely reflected their countryside setting. Retaining the countryside designation of these sites was considered critical to ensure a clear distinction between the urban area and countryside beyond it is maintained, and ad-hoc encroachment is avoided. A Landscape Character Assessment has been undertaken to ascertain the individual characteristics of the countryside surrounding Crawley. Each character area or fringe has been identified and the elements considered important to consider as part of any development proposal are set out in Policy CH9. Land outside the Built-Up Area Boundary is not considered inappropriate, in principle, for development. However, development is expected to reflect the character and context of the immediate surroundings and ensure it enhances the countryside setting of the town. In these instances, it is expected substantially lower levels of density would be achieved in comparison to sites within the urban neighbourhoods or town centre. Examples of this can be seen from Land at Flint Cottage, Tilgate where an application for nine dwellings was refused on appeal in March 2011 (CR/2010/0304/FUL). However, after effective discussions with the developer, a more appropriate scheme has been submitted (CR/2014/0483/FUL) for five detached family homes, with several design and layout changes to reflect the site's countryside setting. Similar discussions are taking place for sites in Worth, including Land South of Saxon Road, where only a small number of dwellings are suitable for sites within a conservation area, in a countryside setting.
- 3.7.6 The Housing Supply Topic Paper⁵⁶ clarifies how open spaces have been explored. The Open Space Study⁵⁷ made recommendations for each neighbourhood including any potential for rationalising open space provision to meet development needs. These

⁵⁵ LP0056: Built Up Area Boundary Review (2012) CBC

⁵⁶ LP012: Topic Paper 3: Housing Supply, p38-39 (2014) CBC

⁵⁷ LP115: Crawley Open Space, Sport and Recreation Study 2013, JPC Strategic Planning & Leisure, leisure and the Environment.

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areas were further explored though more detailed assessment and included as part of the Additional Sites Consultation. It is not considered that further development of other open space sites in Crawley would be appropriate, as the Local Plan has allocated the sites considered either surplus or suitable for development alongside enhanced provision.

Specific Omission sites

(h) Oakhurst Grange Nursing Home

3.7h.1 This site has the potential for 55 residential dwellings and was previously used as a care home before it was closed in 2013. The site was allocated in the submission Local Plan Consultation Draft as a key housing site, but was taken out by a decision at the full council meeting in July 2014. The reason for this was that the council believes that there is evident need for care home provision in Crawley and that if residential development were to be considered a replacement facility would be needed. Policy IN1 of the Local Plan⁵⁸ supports the need to protect existing services and infrastructure where they contribute to the town, unless an equivalent replacement or improvement is provided. Please see Appendix H for the SHLAA extract for Oakhurst Grange, which is now in category I of the SHLAA⁵⁹, sites which are suitable but currently undeliverable.

(i) East of Street Hill

3.7i.1 The council has been in dialogue with the site promoter for a number of years. The site has a number of heritage and environmental constraints that make it unsuitable for the level of housing proposed, including:

- forming part of the historic countryside setting of the Grade I listed Church;
- its allocation within the Worth Conservation Area;
- its Site of Nature Conservation Importance designation (with the majority of the important ecological value located in the southern part of the site);
- containing an archaeological sensitive asset: the Moat;
- forming part of an Historic Park and Garden which has been independently assessed;
- being located outside the Built-Up Area Boundary of the town, following its reassessment by the council.

3.7i.2 Relevant evidence base documents are the Built up Area Boundary Review⁶⁰, Landscape Character Assessment⁶¹ and Historic Parks and Gardens Review⁶². Additional evidence attached includes: The Worth Conservation Area Statement (Appendix I), Worth Meadows SNCI Assessment (Appendix J), and written responses

⁵⁸ LP001: Crawley Submission Local Plan, Policy IN1, p. 115 (2014) CBC

⁵⁹ LP079 SHLAA Category I, November 2014. CBC

⁶⁰ LP056: Crawley Borough Council Built-Up Area Boundary Review (2012) CBC

⁶¹ LP057: Crawley Landscape Character Assessment (2012) CBC

⁶² LP055: Historic Parks and Gardens Report (2013) Sussex Gardens Trust and CBC

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from English Heritage (see Appendix K) and West Sussex County Council (see Appendix L). This evidence is reflected in the SHLAA⁶³ and Sustainability Appraisal⁶⁴ site assessment.

- 3.7i.3 The representor has proposed 30 dwellings⁶⁵. The council's view is that full consideration of the range of designated and non-designated assets and rich time-depth (dating back to circa 10th century) of the site is required before its suitability for any housing can be determined. It is envisaged that this would significantly constrain the development potential of the site, possibly to just a few or a single dwelling/s, in order to retain the character and biodiversity value of the site. For this reason, the proposal is not justified as a housing allocation in the Local Plan. Further analysis should be undertaken as recommended by English Heritage and comments sought. Depending on the outcome of this, a proposal at a density and design accompanied by adequate mitigation, compensation and enhancement opportunities that fully reflect its location may then be considered through the development control process.

(j) Adjacent to Langley Walk and Burlands

- 3.7j.1 This site is within a countryside location adjacent to the urban/rural fringe. The capacity of the site is restricted by its location, outside of the BUAB. Development of the site would need to comply with countryside policies alongside an acceptable design which matches its countryside setting, therefore capacity for 6+ dwellings is not considered suitable and the site is not, therefore, appropriate for allocation. Limited intensification may be acceptable providing the impact on neighbour amenity, street scene, trees, character of the area, and parking can be adequately addressed⁶⁶.
- 3.7j.2 Transport issues (access and highways capacity) would also need to be addressed before the site could be considered for development. Although there are no economic constraints which would prevent the site from coming forward, it is uncertain whether the site is available and due to the constraints given above, the site has been identified in category J, sites which are as unsuitable for development.

(k) Adjacent to Horsham Road and south of Silchester Drive

- 3.7k.1 This site was identified for potential allocation following the UCS⁶⁷. The planning history for the site indicates it is an appropriate location for residential development, with permission being granted for a care home (CR/2008/0586/FUL) which was never implemented, and a second permission approved for a single dwelling adjacent to Silchester Drive (CR/2014/0583/FUL). The council's urban designer undertook a desktop capacity analysis of the site, including access potential, and the

⁶³ LP079: SHLAA, Category J (2014) CBC

⁶⁴ LP003: Sustainability Appraisal/Strategic Environmental Assessment, Sustainability Report for the Submission Local Plan, p278/279 (2014) CBC

⁶⁵ REP005: Mr Richard Bucknall & Tony Fullwood

⁶⁶ LP090: The Urban Capacity Study p16 (2013) CBC

⁶⁷ LP090: The Urban Capacity Study p16 (2013) CBC

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site was suggested in the submission Local Plan as a 'developable' site for 52 dwellings in Policy H2.

- 3.7k.2 However, the site is formed from a number of separate gardens, in individual ownership. There has been no approach from landowners or developers expressing any interest in pursuing this site, and to ascertain some evidence in relation to its likely deliverability in order to retain it in the Plan as an allocation, letters were sent to all of the properties on the site requesting further information. No responses were received which suggested the site would come forward as a housing development during the life of the Plan. Therefore, following the submission consultation⁶⁸, the site was removed from Policy H2 as a Main Modification.
- 3.7k.3 Notwithstanding this, the site is still considered to be an appropriate location for housing development in principle, should a suitable and deliverable scheme be proposed. This is reflected in its assessment as being within the 'Suitable not Deliverable' category of the SHLAA. The Local Plan provides sufficient policies for such a proposal to be considered positively without the need for its allocation. Please see Appendix M for the SHLAA extract for Land Adjacent to Horsham Rd and South of Silchester Drive, which now forms part of category I of the SHLAA⁶⁹, sites which are suitable but currently undeliverable.

⁶⁸ Regulation 19 Consultation, undertaken 1 September – 13 October 2012

⁶⁹ LP079: SHLAA, Category I (2014) CBC