

Crawley

Local Plan

Crawley Borough Local Plan Topic Paper 4: Housing Supply



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1. INTRODUCTION

- 1.1 This Topic Paper is part of the evidence base for the Crawley Borough Local Plan 2021 – 2037¹. It provides a summary of the technical information supporting the council's approach to Housing Delivery which is detailed in the submission Local Plan policies:
- H1: Housing Provision
 - H2: Key Housing Sites
 - H3: Housing Typologies (and sub-policies H3a-f)
 - TC3: Development Sites within the Town Centre Boundary
- 1.2 Other policies in the Plan directly influence the housing land supply, the extent to which these have led to the approach taken by the Local Plan is explained in this Topic Paper. These include:
- CL4: Compact Development – Layout, Scale and Appearance
 - OS1: Open Space, Sport and Recreation
 - EC1: Sustainable Economic Growth
 - EC2: Economic Growth in Main Employment Areas
 - TC1: Primary Shopping Area
- 1.3 It is supported by the Sustainability Appraisal².

2. BACKGROUND

2.1 Crawley Borough Local Plan 2015

- 2.1.1 The Crawley Borough Local Plan was adopted in December 2015. It includes the following policies which concern or closely influence the supply of housing:
- SD1: Presumption in Favour of Sustainable Development (predecessor to Policy SD1 of the submission draft 2021 Local Plan)
 - CH1: Neighbourhood Principle (predecessor to CL1)
 - CH4: Comprehensive Development and Efficient Use of Land (Policies CL3 and CL4 of the submission draft 2021 Local Plan expand on the intentions of this policy)
 - EC1: Sustainable Economic Growth (predecessor to EC1)
 - EC2: Economic Growth in Main Employment Areas (predecessor to EC2)
 - EC5: Primary Shopping Area (predecessor to TC1)
 - EC6: Development Sites within the Town Centre Boundary (predecessor to TC3)
 - H1: Housing Provision (predecessor to H1)
 - H2: Key Housing Sites (predecessor to H2; also related to Policies H3 and H3a-f of the submission draft 2021 Local Plan)
- 2.1.2 The Local Plan Sustainability Appraisal sets ensuring 'that everyone has the opportunity to live in a decent and affordable home' as a key sustainability objective, and identifies the following monitoring indicators:
- Net additional dwellings – in previous years;

¹ Submission Draft Crawley Borough Local Plan (January 2021) CBC

² Crawley Sustainability Appraisal/Strategic Environmental Assessment (January 2021) CBC

- Net additional pitches (Gypsy and Traveller);
 - Supply of ready to develop housing sites (5-year housing land supply);
 - New and converted dwellings – on previously developed land (PDL).
- 2.1.3 The council's Authority Monitoring Reports in the period since the adoption of the Local Plan have monitored the above indicators as well as the following:
- Mix of housing delivered;
 - Delivery of affordable housing;
 - Progression of Town Centre sites identified in Local Plan Policy EC6.
- 2.1.4 In broad terms, the approach to housing supply set out in the Local Plan acknowledges and reflects the borough's constrained land supply, resulting from Crawley's tightly-drawn administrative boundaries and the constraints on a significant proportion of the land within them, including safeguarding for an additional southern wide-spaced runway at Gatwick Airport, and the noise constraints arising from current and potential aviation. Within the Built-Up Area Boundary, the Local Plan also seeks to protect some non-residential uses which are key to the borough's economy or which provide necessary infrastructure or leisure services to Crawley's population. In this context Policy H1 identifies a housing supply of 5,100 dwellings (annualised at 340dpa), amounting to just over half of the objectively assessed need of 10,125. This leaves a remaining unmet need of 5,025 (335dpa), which the council commits to seeking to address through the Duty to Cooperate. Between them Horsham District Planning Framework (2015) and Mid Sussex District Plan (2018) currently make provision for this unmet need.
- 2.1.5 The extent and nature of the land allocated for housing in Policies H2 and EC6 reflect the constraints identified above. The North East Sector (now Forge Wood), is allocated as a new neighbourhood of 1,900 dwellings (with two further residual sites expected to add another 150), representing the last currently identifiable opportunity of this nature with the borough's current administrative boundaries. Other allocations and broad locations are made up primarily of previously developed land, together with some playing fields or other open space facilities identified as surplus or capable of being reprovided (Tinsley Lane and Breezehurst Drive Playing Fields). A significant proportion of this housing supply is expected to come from the Town Centre, where Policy EC6 provides for a minimum of 499 dwellings to be delivered across four mixed-use 'Key Opportunity Sites'. Additional development is anticipated on further identified Town Centre sites and across the Town Centre more generally as a 'Broad Location'.
- 2.1.6 As set out in the Housing Trajectory supporting the Local Plan, the identified housing supply was anticipated to come forward mainly in the early years of the Local Plan period, before tailing off in later years to a baseline windfall allowance of 55 dwellings per annum.

2.2 Legislation

2.2.1 The Planning and Compulsory Purchase Act (as amended):

- Section 14A gives ministers powers to set out requirements in Regulations regarding the preparation, maintenance and publication of registers of land.
- Section 19(1B) of the Act states that each 'local planning authority must identify the strategic priorities for the development and use of land in the authority's area.'
- Section 33A of the Act places local planning authorities under a duty to cooperate with other local planning authorities in preparing Local Plans, where strategic matters have impacts across administrative boundaries.

2.2.2 The Brownfield Land Register Regulations 2017 set out requirements for the preparation, publication and maintenance of Brownfield Land Registers by local planning authorities. The Registers, as defined by the Regulations, are concerned with areas of previously developed land which are suitable for housing-led development.

2.3 National Policy

2.3.1 National Planning Policy for England is set out in the National Planning Policy Framework (NPPF) (2019). The NPPF details the purposes of the planning system in terms of 'Sustainable Development', which is comprised in three 'overarching objectives, which are interdependent and need to be pursued in mutually supporting ways':

- an economic objective;
- a social objective;
- an environmental objective.

National policies relevant to housing delivery include:

- Para. 11 (presumption in favour of sustainable development), including the requirement that 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs which cannot be met within neighbouring areas', unless specific constraints apply in terms of national policy regarding 'areas or assets of particular importance', or unless any adverse impacts would 'significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.
- Para. 20, requiring that Strategic Policies make sufficient provision for 'housing (including affordable housing)'.
- Ch. 5: Delivering a sufficient supply of homes.
- Ch. 11: Making effective use of land.

2.3.2 Planning Practice Guidance is a web-based resource containing Government guidance regarding compliance with national planning policy and legislation. It is periodically updated. Sections of particular relevance to housing supply include:

- Brownfield Land Registers;
- Effective Use of Land;

- Housing and economic needs availability assessment;
- Housing Supply and Delivery.

2.4 Evidence

- 2.4.1 **Monitoring of Policy Implementation** through the council's Authority Monitoring Reports has shown that overall housing delivery since 2015 has been running significantly ahead of the adopted annual average 340 dwelling requirement, with an average of 509 dwellings being delivered each year in the period 2015-19. A net total of 452 further dwellings in C3 use was added in 2019/20, although if the figures for C2 accommodation are taken into account (using the ratio of one C3 dwelling equivalent for 1.8 bedrooms, as set out in the Housing Delivery Test³) the demolition of a care home during this year brings this net total down to 404.
- 2.4.2 A feature of the delivery during this period is that allocated sites have been slower to come forward than anticipated and have therefore made a smaller contribution to housing supply, so far, than anticipated. During the period 2015-20 sites allocated in the Plan made a gross contribution of 1375 dwellings compared with 2363 projected for the same period in the 2015 Local Plan Housing Trajectory, while other sites identified in the 2015 Housing Trajectory made a contribution of 54 rather than the 100 projected⁴. So, as of April 2020, a large proportion of the indicative housing supply allocated for the 2015-30 period in 2015 (2190 dwellings out of 3565⁵) remained undelivered.
- 2.4.3 Windfall sites on the other hand have made a significantly larger contribution than expected, with 507 dwellings coming forward on sites not identified in the 2015 Housing Trajectory (including small sites) during 2015-20, compared to a projected figure of 330 (including small sites). This has been particularly true in the case of commercial to residential change of use prior approval schemes. Usually these have taken place in former office premises.
- 2.4.4 One spatial characteristic of the housing supply delivered during the period 2015-20, accentuated by the windfall supply, has been the development of the Town Centre as a residential location. Residential accommodation in the Town Centre was negligible at the beginning of the twenty-first century, but has grown significantly over the past two decades. It is anticipated that the total number of Town Centre dwellings will reach 1000 during 2020/21, as a number of larger schemes are completed, resulting in a population which would be equivalent to a small neighbourhood. The target of 499 dwellings to be delivered on Town Centre Key Opportunity Sites already looks set to be exceeded, with 185 already delivered, a further 91 nearing completion, and a further 490 benefitting from outline planning consent.

³ Housing Delivery Test: 2019 measurement technical note, MHCLG, 2020.

⁴ These figures exclude sites which featured in the Local Plan housing trajectory as part of the post-2015 housing supply but which were in fact already complete as of April 2015 (Brunel Hall, Brunel Place; 19-21 Queensway; and Scout Group and Guides Hall, Lark Rise).

⁵ Figures exclude completions prior to April 2015 on sites allocated in the 2015 Local Plan.

- 2.4.5 The overall result of these trends has been that delivery during the period 2015-20 has been lower than projected at the time of adoption of the Plan. Thus whereas the 2015 Local Plan Housing Trajectory projected a significant tailing off of delivery between years 1 to 5 and years 6 to 10, and then again in years 11 to 15, actual levels of delivery point to a more 'flattened' curve. Delivery in years 1 to 5 has nonetheless still easily outperformed the Local Plan annual average requirement (340dpa), which is based on the average for the Local Plan period as a whole.
- 2.4.6 Since the delayed allocated sites are still expected to come forward in time (with, in many cases, a higher quantum of development than previously projected), the delivery of additional windfalls in 2015-20 amounts to an increase in the overall housing supply, compared with what was set out in the Plan. As such, calculations of the council's five year housing land supply – set out alongside the Housing Trajectory in successive Authority Monitoring Reports – have indicated a significant surplus.
- 2.4.7 In the context of the **Housing Delivery Test** calculation, the combination of a relatively high rate of delivery with the export of unmet need to neighbouring authorities on the basis of a lower anticipated housing supply has generated high results of 181% and 235% in 2018 and 2019 respectively. To a large extent these figures are considered to be a function of the way in which the calculation is undertaken, rather than a meaningful indication of the balance of housing demand and supply.
- 2.4.8 The Local Plan is supported by a **Strategic Housing Land Availability Assessment (SHLAA)** dated September 2020. This sets out to assess sites in Crawley which may be capable of contributing to the borough's housing supply over the period 2019-37. It includes sites from the following sources:
- Unimplemented sites included in earlier versions of the SHLAA going back to 2014;
 - Sites with unimplemented planning permission for residential development (or where applications for prior approval have been granted but not implemented);
 - Unimplemented sites which are allocated in the 2015 Local Plan or proposed for allocation in the submission draft 2021 Local Plan;
 - Sites where planning permission have expired within the last 5 years;
 - Sites where planning permission (or prior approval) has been refused;
 - Sites which have been promoted to the council, including in response to a Call for Sites undertaken alongside the Local Plan Regulation 18 consultation in 2019.

Sites capable of delivering between 1 and 4 dwellings are only included where they have a live consent, and where these sites are uncommenced a discount is applied on the assumption that only 45 per cent of the dwelling quantum will be delivered. This adjustment is made to allow for an anticipated level of non-delivery on these sites, and is applied on a standard basis by West Sussex County Council as part of their annual Residential Land Availability survey.

Where sites are considered suitable an indicative development yield is specified and, subject to assessment of availability and achievability, this is counted as part of Crawley’s housing land supply, with projected development timescales set out (based on the Housing Trajectory – discussed below).

The SHLAA is structured according to the following categories:

Category A	Large Housing Sites (5-29 dwellings) with planning permission
Category B	Small Housing Sites (1-4 dwellings) with planning permission
Category C	Local Plan Key Housing Allocations (Policy H2) which are ‘deliverable’
Category D	Local Plan Key Housing Allocations (Policy H2) which are ‘developable’
Category E	Local Plan Key Town Centre Opportunity Sites (Policies H2 & TC3)
Category F	Broad Locations
Category G	Other ‘deliverable’ sites capable of delivering 5-29 dwellings
Category H	Other ‘developable’ sites capable of delivering 5-29 dwellings
Category I	Sites that are suitable but currently undeliverable/developable
Category J	Sites which are unsuitable for residential development

2.4.9 The submission draft Local Plan is also supported by a **Housing Trajectory** with a base date of 1 September 2020. This sets out projected timescales for the delivery of the housing supply identified in the SHLAA over the period 2019/20 to 2036/37 (with the Local Plan period itself counted from 2021/22). In addition to the SHLAA sites it includes a windfall allowance in accordance with the Windfall Statement discussed below. In the case of the sites identified as coming forward in the form of communal (C2) development, an equivalent C3 total is indicated based on the ratio of 1 dwelling / 1.8 bedrooms as specified in the Housing Delivery Test: 2019 measurement technical note.

2.4.10 The housing trajectory is set out in four sections:

- Summary Trajectory, setting out the overall gross and net delivery, broken down into identified sites, windfalls and communal accommodation (since the windfall allowance includes an allowance for small sites it is reduced in the years 2021/22, 2022/23 and 2023/24 to avoid double counting of small site delivery already included in the yield from identified sites). A 5-year housing land supply of 5.2 years is calculated on the basis of this, in relation to the Housing Requirement set out in Policy H1 of the draft Plan.

- SHLAA Category Breakdown, setting out how the projected delivery breaks down between different categories of sites identified in the SHLAA.
- Sites breakdown, detailing the projected timing of delivery on individual sites with a yield of 5 units or more.
- Communal Accommodation summary, breaking down the contribution of sites projected to provide communal residential development, as summarised in the Summary Trajectory.

The timings detailed in the housing trajectory reflect a range of information sources, including responses (or non-responses) from site owners and developers, and progression of a site in terms of applying for and obtaining planning permission (and outline consent and reserved matters where applicable). The timings take into account the assessment of sites as being either 'deliverable' or 'developable' in accordance with the definitions set out in Annex 2 of the NPPF.

- 2.4.11 In accordance with the Brownfield Land Register Regulations, the council has annually updated its **Brownfield Land Register (BLR)** since 2017. The 2020 update is largely reflective of the September SHLAA, containing 24 sites with a total area of 15.46ha. For some of the sites (where no form of planning permission currently exists) the projected yield is expressed as a range rather than a single figure, in accordance with the Regulations and the Government's data standards for the Register.
- 2.4.12 The Windfall allowance included within the Housing Trajectory and in the overall projected housing supply for the Local Plan period is based on a separate **Windfall Allowance Statement** which is published separately as part of the Local Plan evidence base. The findings of this Statement are summarised in further detail in Section 3.6 below.
- 2.4.13 The Local Plan approach to **Densification and Urban Form** is supported by the **Crawley Densification Study**. The densification study has been prepared to support the Local Plan approach in responding to the emphasis placed on the effective use of land in the NPPF. It identifies the potential for achievement of increased densities and a more compact form of development within the borough, particularly in certain areas, and the potential for this to deliver wider benefits in terms of wellbeing and climate change, provided that this is undertaken in a way which responds to existing character and incorporates high standards of design.

3. STRATEGIC ISSUES

3.1. Housing Requirement

- 3.1.1 On the basis of the housing supply identified in the SHLAA and Housing Trajectory, Policy H1 of the submission draft Local Plan sets a requirement of 5320 dwellings over the period 2021-37, representing an annual average of 332.5 over 16 years. The Housing Trajectory projects that delivery of this supply will be weighted towards the early and middle part of the Local Plan period, with delivery falling in years 11 to 16 as the supply of identified sites

dwindles. In order to take account of this, and in particular to avoid a situation where the council fails the Housing Delivery Test in later years due to delivery levels falling below the average for the whole period, a stepped housing requirement is proposed as follows:

- 350dpa in years 1-5
- 450dpa in years 6-10
- 220dpa in years 11-16

The Housing Trajectory calculates a 5.2 year housing supply on the basis of this Local Plan requirement, including a 10% buffer brought forward from later in the Local Plan period on the basis of para. 73 of the NPPF. This partially ‘front loaded’ housing requirement sets a higher bar for delivery in the earlier part of the Local Plan period than would arise from an ‘un-stepped’ average for the full Local Plan period, and the requirement for years 1 to 5 represents a modest increase on the current adopted requirement of 340dpa.

3.2. New Sites

3.2.1. Due to Crawley’s reliance on previously developed land within the town as a source of housing supply there is little scope for strategic-scale residential development. Instead sites (e.g. as detailed in the SHLAA) range in size from single dwellings up to the hundreds, with a lower average yield per site than might be expected in a large rural district. One feature of this type of housing supply is that sites can become available and be promoted within a relatively short time frame as they are released from other uses. In this context it is not always easy to predict which sites may be promoted for residential development and what additional dwelling quantum may result. As detailed in the Windfall Statement, windfall sites which were not identified in the Crawley Borough Local Plan 2015 (Crawley 2030) provided 507 additional net dwellings over the period 2015-20. The September Housing Trajectory projects a further 215 net additional dwellings on windfall sites as part of a projected total delivery of 740 in the current year.

3.2.2. Policy H2 of the submission draft Local Plan allocates 8 new sites for residential use which were not identified in the Crawley Borough Local Plan 2015 (Crawley 2030). These sites have a combined projected site capacity of 733 dwellings (26 of which are among the projected 215 ‘windfall’ deliveries in 2020/21), as detailed in the following table:

Site Name	Indicative Site Capacity	Commentary
Upper Floors, 7 – 13 The Broadway & 1 – 3 Queens Square	25 dwellings	Deliverable. Granted planning permission in March 2016 (CR/2015/0694/FUL). Works appear to have been completed but commencement is understood to have

Site Name	Indicative Site Capacity	Commentary
		post-dated expiry of the permission, so regularisation will be required.
Land Adjacent to Sutherland House, Russell Way, Three Bridges	30 dwellings	Deliverable. Site is within curtilage of a former office building now converted to residential use, and is currently being promoted for additional new-build development.
Shaw House, Pegler Way, West Green	33 dwellings	Deliverable. Building is currently undergoing conversion. Previous consents on the site (CR/2016/0816/PA3; CR/2014/0811/FUL) have totalled 33 dwellings. 26 dwellings are projected for delivery in 2020/21 as a result of conversion works.
The Imperial, Broadfield Barton, Broadfield	19 dwellings	Deliverable. Benefits from full planning permission (CR/2017/0519/FUL) for 19 apartments and A1 / A4 uses at ground floor level.
Crawley College, Three Bridges	400 dwellings	Developable. The remaining College Site (following development of Bridgefield House) is allocated as a Town Centre Key Opportunity Site for housing-led development alongside retained Further Education facilities.
MOKA	152 dwellings	Deliverable. This site benefits from planning permission for a 152-apartment scheme (CR/2019/0542/FUL), and is allocated as a Town Centre Key Opportunity Site.
Rushetts Road Play Area	14 dwellings	Developable. This site is owned by the council and intended to be brought forward for a residential scheme, including replacement of the play area.
St. Catherine's Hospice	60 dwellings or Residential Rooms	Developable. This site is due to become available with the relocation of the Hospice to Pease Pottage, and is allocated for Housing for Older People

Site Name	Indicative Site Capacity	Commentary
		and those with Disabilities, either in C2 or C3 use.

3.3. Densification

- 3.3.1 The Local Plan approach to densification and urban form, as supported by the Crawley Densification Study, is set out in draft Local Plan Policies CL3: Movement Patterns, Layout, and Sustainable Urban Design, and CL4: Compact Development – Layout Scale and Appearance, as well as the housing typology Policies (H3, H3a-f).
- 3.3.2 Policy CL3 sets out a general expectation that new developments should seek to achieve a more compact form of development by exploiting and supporting sustainable transport options and connections. It identifies particular scope for larger schemes to come forward on this basis close to stations, stops and interchanges along high capacity public transport corridors, as identified in the Reasoned Justification to the Policy.
- 3.3.3 Policy CL4 sets out density-range expectations for residential developments in different areas, subject to character constraints. These range from a default level of 45 dwelling per hectare; through a ‘Medium density’ range of 60-200 dwellings per hectare in well-connected parts of the borough where character considerations are a constraint on higher densities; to a ‘High Density’ minimum figure of 200 dwellings per hectare in well-connected areas where character-based considerations are less of a constraint.
- 3.3.4 Within this framework it is anticipated that proposals for residential development are likely to come forward in various different circumstances, particularly within the current Built-Up Area Boundary and on previously developed land. Policies H3 and H3a-f therefore set out an approach to ‘Housing Typologies’, understood as of sites of particular types in terms of their existing uses and physical form. Policy H3 sets overarching requirements while Policies H3a-f set out further requirements specifically tailored to schemes of the following types:
- Estate Regeneration;
 - Densification, Infill Opportunities and Small Sites;
 - Town Centre Sites;
 - Upward Extensions;
 - Conversions from Commercial/Non-residential uses;
 - Open Spaces.

3.4. Densification: Reassessment of Existing Allocated Sites

- 3.4.1 The scope for the achievement of higher densities and a more compact pattern of development is illustrated by the way in which the delivered or anticipated dwelling totals on many sites allocated in the adopted Local Plan have come to exceed those projected at the time of allocation. This trend, as

detailed in the table below, has resulted in an anticipated net gain of 976 dwellings compared with what was projected at the point of allocation.⁶ There have been various immediate triggers for such changes, including grants of planning permission for larger schemes, and the reassessment of site potential in light of feasibility work and the Local Plan Review process.

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
Forge Wood	1,900 dwellings	1,855 dwellings	-45 dwellings	Reserved Matters progressing against Outline Permission granted for Up to 1,900 dwellings. It is currently anticipated that the actual delivery will fall slightly short of the overall total.
Land Adjacent to Desmond Anderson	100 dwellings	150 dwellings	50 dwellings	Increase resulting from reassessment of site potential.
15-29 Broadway Upper Floors	57 dwellings	78 dwellings	21 dwellings	Larger scheme permitted (CR/2015/0609/FUL), and completed during 2020/21.
Zurich House	59 dwellings	53 dwellings	-6 dwellings	Reduction owing to amended proposal (conversion and extension of existing building – CR/2019/0271/PA3 & CR/2019/0681/FUL – rather than demolition and rebuild).
Former TSB Site	40 dwellings	90 dwellings	50 dwellings	Increase resulting from reassessment of site potential.

⁶ In some cases – as shown in the table – sites have recently approved permissions or live applications which are sometimes higher and sometimes lower than the indicative allocation totals. Taken cumulatively, however, these would push the total yield from these sites even higher.

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
				Planning application for 59 dwellings (CR/2020/0037/FUL) currently pending determination.
Longley Building	48 dwellings	100 dwellings	52 dwellings	Increase resulting from reassessment of site potential. Scheme of 121 dwellings (CR/2020/0024/FUL) was approved subject to S106 in November 2020.
Telford Place	99 dwellings	300 dwellings	201 dwellings	Increase resulting from reassessment of site potential.
Crawley Station and Car Parks	300 dwellings	308 dwellings	8 dwellings	Outline Planning Permission (CR/2016/0294/OUT) Granted; further detailed proposals pending determination (CR/2019/0602/ARM & CR/2019/0660/FUL)
County Buildings	50 dwellings	100 dwellings	50 dwellings	Increase resulting from reassessment of site potential.
Land North of the Boulevard	50 dwellings	458 dwellings	408 dwellings	185 dwellings completed 2016/17 (CR/2015/0192/PA3); 273 further dwellings projected of which 91 commenced (CR/2016/0662/FUL) and 182 subject to outline consent (CR/2017/0997/OUT).

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
Tinsley Lane	120 dwellings	120 dwellings	0 dwellings	Housing and Open Space Site. Policy requirements to replace football club and other open space provisions. Development Brief prepared. Outline Planning Application for 150 dwellings (CR/2018/0544/OUT) was refused in October 2020.
Breezehurst Drive Playing Fields	65 dwellings	65 dwellings	0 dwellings	Housing and Open Space Site. Policy requirements to replace football pitch and other open space provisions. Development Brief prepared. Planning Application (CR/2020/0192/RG3) being considered for 85 dwellings.
Henty Close	24 dwellings	24 dwellings	0 dwellings	Small site requires replacement play area.
Land East Balcombe Road/Street Hill, Worth	Maximum 15 dwellings	Maximum 15 dwellings	0 dwellings	Site constrained by heritage, ecological, flooding and countryside character.
Oakhurst Grange	55 dwellings (or 120 residential rooms)	55 dwellings (or 120 residential rooms)	0 dwellings	Planning permission (CR/2016/0972/FUL) for facility with 146 rooms in total has been commenced by demolition of existing buildings.
Town Centre Broad Location	156 dwellings	230 dwellings	74 dwellings	98 dwellings (CR/2018/0341/FUL) under construction at

Site Name	Adopted Indicative Site Capacity	Updated Indicative Site Capacity	Difference	Commentary
				Central Sussex College (raised from 36 in adopted Plan); 20 dwellings allocated at Cross Keys (up from 18 at equivalent site 'Old Vicarage, Church Walk' in adopted plan); 112 dwellings projected from other Town Centre Broad Location sites (up from 102 in adopted Plan).
Residual Land at Forge Wood	150 dwellings	335 dwellings	185 dwellings	Outline Planning Permission granted for 185 dwellings at Steers Lane (CR/2018/0894/OUT) and Reserved Matters pending determination (CR/2020/0548/ARM). Land at Heathy Farm allocated for 150 dwellings.
Land East of London Road	171 dwellings	99 dwellings	-72 dwellings	Reduction in projected yield owing to concerns over site assembly and some incursion on previously identified area from neighbouring development.

3.5. Employment Land, Upward Extensions & Town Centre

3.5.1 One key theme of the submission draft Local Plan is the striking of an appropriate balance between the supply of housing and support for the borough's economy, through the maintenance of a supply of employment land and support for key assets within the economic structure of the borough. Proposed Policies EC1, EC2 and TC1 seek to support these aims, while accommodating the conversion of employment land to residential use

in circumstances and locations where this can be achieved without harm to the borough's fundamental economic role.

- 3.5.2 Policy EC1 and the supporting Employment Land Trajectory identify the borough's available supply of employment land. They show that this supply, when adjusted for projected losses to other uses, falls significantly short of the borough's anticipated employment needs as set out in the council's Economic Growth Assessment Update, justifying the further allocation of a Strategic Employment Location at Gatwick Green by proposed Policy EC4.
- 3.5.3 Given the need to support the borough's employment land supply, and given the significance of the borough as a focus of economic activity across a wider area, Policy EC2 seeks to protect employment uses within 10 identified Main Employment Areas with established characters and functions. The council has also introduced Article 4 Directions to protect employment uses within many of these Areas.
- 3.5.4 The Town Centre is included among the Main Employment Areas identified in Policy EC2. Policy TC1 seeks to support the vitality and viability of the Town Centre by maintaining ground floor premises in suitable uses within the defined Primary Shopping Area. At the same time the policy provides scope for use of upper floors within this Area for a wider range of uses, including residential use and town centre neighbourhood facilities, subject to requirements of Policy EC2 where there is a net loss of employment floorspace. The approach is similar to that taken under the current adopted Policy EC5, under which there has been an increasing diversification of uses at upper-floor level within the Primary Shopping Area, including an increase in residential accommodation. As part of the housing typology approach described in section 3.3 above, Policies H3 and H3c provide a framework for consideration of residential schemes in these circumstances. Policy H3d meanwhile sets out the approach in relation to upwards extensions, which provide a further potential means of supporting a wider range of uses and an increase in residential accommodation.
- 3.5.5 Across the Town Centre more generally the approach of the existing and proposed Local Plan Policies is to support an increase in residential accommodation in suitable locations through the allocation of Town Centre Key Opportunity Sites. Policy TC3 of the submission draft Plan sets a target of 1,500 net additional dwellings across sites in this category – an increase of a thousand additional new dwellings compared with the adopted Local Plan which set a target of 499 dwellings across the Town Centre Key Opportunity Sites.

3.6. Windfalls

- 3.6.1 The **Windfall Allowance Statement** projects a windfall allowance of 90 dwellings per annum, representing a significant uplift from the allowance of 55 dwellings per annum included in the 2015 Local Plan and Housing Trajectory. This raised allowance is reflected in the September 2020 Housing Trajectory. It is based on an assessment of the council's earlier 2014 Windfall

Paper, in light of actual levels of windfall delivery following the adoption of the Local Plan. In particular it allows for:

- a higher rate of delivery of homes through office-to residential changes of use on windfall sites, reflecting the contribution which such sites have made since 2015, and the extent to this can be sustained given potentially available office stock;
- the achievement of higher densities of development in suitable locations, through a greater policy focus on densification and urban form, in accordance with the emphasis placed on the 'effective use of land' by the NPPF.

3.7. Open Space

3.7.1 Three linked Open Space, Sport and Recreation studies have recently been undertaken as part of the evidence base for the Local Plan. In the context of the Housing Supply topic paper, these studies provide an understanding of open space need/supply within the Local Authority and help the council identify any scope for release of some of this land for housing. The three studies are: the Playing Pitch Strategy; Open Space, Sport and Recreation Assessment; and the Indoor Sports Facilities Assessment. Each study provides an outline of the use and participation in sports and sporting venues within Crawley, explains current national and local policies and provides recommendations and action plans for moving forward. The Playing Pitch Study and the Indoor Sports Facilities Assessment have been prepared against Sport England guidance and have both been signed off by Sport England.

3.7.2 Key messages from the Playing Pitch Strategy include:

- Sports such as cricket, football and rugby analysed within the study area are playing on pitches over capacity. The summary tables in Chapter 3 of the "Stage D" Report recognise that, due to projected population growth, football, cricket and rugby have a need to increase the supply of available pitches to meet future demand and the level of overplay on sites has to be taken into account in open space assessments in order to forestall a larger level of unmet demand in the future.
- While tennis, Artificial Grass Pitches, golf, petanque, and netball have sufficient capacity to expand, removal of these recreational spaces would be likely to cause a deficit.
- A consultation with the Bowls clubs has shown that they may require additional space but a further consultation is required.

The study has specific recommendations for each sport. However, in general, Recommendation G0 is to protect all current pitches identified in order to reduce risk of loss and subsequent impact on sport and physical provision. The study does not support the loss of dormant or currently disused playing field sites.

Recommendation G1 is to increase provision in relation to population growth, so the aim is to not lose pitches but to enhance ancillary facilities and drainage provision where necessary.

3.7.3 According to the Open Space, Sport and Recreation Assessment:

- In each open space typology assessed, other than allotments, the Assessment's proposed quantity standards are, on a study wide area, reached (Table 37 of the Assessment). This is helpful in meeting the Assessment's recommendation to 'Adopt the Recommended Standards'.
- Existing quantity provision against proposed quantity provision shows a narrow surplus (ha/1000 population) for most open space typologies other than allotments, which is in deficit, and Cemeteries and Churchyards and Civic Spaces, which do not have a proposed standard in hectares (Table 38 of the Assessment). However, a key recommendation of the Assessment is 'Protect Surplus Open Space'.
- The future provision shows a lower surplus (and higher deficit for allotments) than the current provision (Table 39 of the Assessment).
- The surplus does not consider loss of space through proposed housing allocations during the Local Plan period (see para. 3.7.10 and accompanying table below). Therefore, the surplus is likely to be lower by the end of this period.
- Furthermore, when considering surplus open space, the Assessment recommends that the historical, cultural, visual, amenity and ecological value of a site is acknowledged in order to understand the full ramifications of its loss including wider green infrastructure implications.
- Distribution of open space, and types of open space, across the borough is uneven.

3.7.4 The Indoor Sports Facilities Assessment:

- Recognises the need to protect the existing facility mix within Crawley (Recommendation 1 of the Assessment).
- It acknowledges that nearby development at Crawley (i.e. outside of Crawley's administrative boundaries but immediately adjacent to the borough) will have a significant impact on Crawley's resources.
- In relation to future demand, the analysis on indoor bowls, swimming pools, fitness suites and studios, indicates a need to expand in recognition of population growth.
- For indoor tennis, the Assessment highlights the Lawn Tennis Association's mandate for priorities in South East England and this shows the importance of working with the national governing bodies of sports to achieve a sports success, particularly as although Crawley is not listed as a priority area for improvement, several neighbouring authorities are. There is evidence within the assessment of the sport of participants travelling to neighbouring facilities and vice versa. The Assessment highlights that for indoor tennis it is important for access to pay and play tennis both now and in the future. Therefore, at a minimum, the facility supply available must remain the same.
- Gymnastics and trampolining are looking to expand to have additional facilities, as the supply of facilities is significantly inadequate for meeting current demand.

- There are several other sports: squash, judo, boxing, parkour, martial arts, dance and table tennis whose provision is required to be maintained.
- 3.7.5. In conclusion, scope for release of additional open space for housing is severely constrained by the importance of retaining open space, including the various pitches, open spaces and indoor facilities within Crawley, as an asset serving the community. The needs met include both formal play and informal play (which may not be as well recorded). Each study has been robustly prepared and in general recommends improving and enhancing existing provision and ancillary facilities in order to compensate for sites where over-use and over-playing occurs as well as to plan for the anticipated future population growth. In particular, consideration needs to be given for disused sites within the borough as to whether improvements can lead to a better balancing of open space, sport and recreation use across the borough (including pitch provision).
- 3.7.6 Part of the Local Plan Policy test is: in order to build on open space, it must be in a surplus to open space, sport and recreation requirements. However, the narrow existing surplus and future surpluses within the Open Space, Sport and Recreation Assessment need to be considered in the context of what wider facilities will be available for the community who will live on the housing site once built. In addition, applications which enter the planning register between the end of the Assessment and the next update are not necessarily factored into the surplus, therefore, the surplus of open spaces may be lower than anticipated, particularly as sites within Crawley for housing are increasingly small and rarely offer opportunities to secure new additional open space as part of the developments. This is justification for protecting what open space is available due to the already acknowledged decrease in surpluses where future population growth is considered. In addition, the distribution of open space across the borough means that in some locations residents have further to travel to enjoy particular types of open space. Existing “surplus” open space for one typology could potentially be redeveloped for another type of open space needed for that location.
- 3.7.7 In relation to the Playing Pitch Strategy, consideration for disused sites should first be given to other recreational sports, as stipulated within the open space Local Plan Policy OS1. The Strategy supports this by highlighting where each national governing sport body is planning on investing. Furthermore, consideration needs to be given to neighbouring authorities who make use of Crawley’s facilities and affect the supply available to Crawley’s population.
- 3.7.8 On this basis, altogether there are several priorities and uses for current open space provision and each site’s existing use is needed to be balanced within the wider open space, sport and recreation context to ensure it meets future population growth needs and resolves existing over-capacity issues.
- 3.7.9 The evidence of the Open Space studies is reflected in Policy OS1 of the submission draft 2021 Local Plan, which requires that proposals which

remove or affect existing open space, sport and recreational spaces will only be supported where they have been demonstrated to be surplus to requirements, or where the loss would be offset or outweighed by equivalent or better provision in a suitable location, or where the development provides alternative sports and recreational provision for which there is a greater need. In the context of the Housing 'Typology' Policies, Policy H3f sets out further requirements in relation to such schemes, relating to such issues as:

- impact on character and environmental value;
- design;
- mitigation of adverse impact on the wider Green Infrastructure Network;
- biodiversity net gain; and
- Flood risk impact.

Specific requirements are also set out in relation to development on garden sites, including impact on character, protected trees and Ancient Woodland.

3.7.10 The following proposed Local Plan housing allocations include land identified as open space:

Site Name	Indicative Site Capacity	Commentary
Tinsley Lane	120 dwellings	Housing and Open Space Site. Policy requirements to replace football club and other open space provisions. Development Brief prepared. Outline Planning Application being considered for 150 dwellings.
Breezehurst Drive Playing Fields	65 dwellings	Housing and Open Space Site. Policy requirements to replace football pitch and other open space provisions. Development Brief prepared. Planning Application being considered for 85 dwellings.
Henty Close	24 dwellings	Small site requires replacement play area.
Land East Balcombe Road/Street Hill, Worth	Maximum 15 dwellings	Policy requirements to secure ecological enhancements, management and maintenance on remaining Local Nature Site.
Rushetts Road Play Area	14 dwellings	Development to provide replacement play area.

3.7.11 These were all examined at the previous Local Plan examination for the adopted Local Plan, with the exception of Rushetts Road Play Area. The Policy wording for these sites details the expectations required in order to mitigate the loss of the open space for development. The inclusion of this detail was supported by Sport England as part of the Main Modifications consultation held in summer 2015⁷. Since the adoption of the Local Plan liaisons with Sport England continued through the preparation of the subsequently adopted Development Briefs for both Tinsley Lane Playing Fields⁸ and Breezehurst Drive Playing Fields⁹ allocation sites in addition to their role as a statutory consultee to the planning applications. This has included consideration of the most up-to-date information regarding sports and club needs at the time to ensure the open space and sports needs continue to be adequately and proportionately met through the development of these sites.

3.8. Estate Regeneration

3.8.1 Estate Regeneration represents a specific form of development whereby residential development is achieved through the renewal and in some cases redevelopment of existing estate housing. Historically the scope for this has been limited by the relative absence in Crawley of higher density flatted developments among the older 'New Town' housing stock, and latterly by the tendency for ownership to become fragmented through the sale of freehold property and the sale of leases under the Right to Buy. No significant estate regeneration schemes have as yet been proposed by the council and any potential schemes which may emerge are likely to take time owing to the complexity of this kind of development. At the same time, this type of approach is expected to become increasingly relevant as part of the wider national and local agenda on densification, and is given specific support in national policy.

3.8.2 In light of this and as noted in section 3.3 above, Estate Regeneration is one of the potential forms of residential development for which provision is made as part of the 'typology' approach set out in draft Local Plan policies H3 and H3a-f. Policy H3a thus sets out specific requirements for this form of development in terms of the need for a comprehensive masterplan approach; the importance of balancing efficient use of land with residential amenity and open space requirements; and the engagement of local communities and affected individuals.

⁷ Crawley Local Plan Main Modifications Consultation Statement, Appendix 8: Representations Received, pages 63-66 (August 2015) CBC

<https://crawley.gov.uk/sites/default/files/documents/PUB266060.pdf>

⁸ Tinsley Lane Playing Fields Development Brief Supplementary Planning Document (April 2017) CBC

<https://crawley.gov.uk/planning/planning-policy/local-plan/supplementary-planning-documents/tinsley-lane-spd>

⁹ Breezehurst Drive Playing Fields Development Brief Supplementary Planning Document (June 2018)

CBC <https://crawley.gov.uk/planning/planning-policy/local-plan/supplementary-planning-documents/breezehurst-drive-playing>

3.9. North of Crawley

- 3.9.1 As noted in Section 2.1 above, the constraints on the available supply of housing land within Crawley arise partly from the safeguarding of land for a potential future southern wide-spaced runway at Gatwick Airport, and the noise impacts which would arise from a runway in this location. Policy GAT2 of the submission draft Local Plan proposes to keep this safeguarding in place. Even in the event that national aviation policy provided certainty that safeguarding was no longer required, the additional supply of land for development in this area would mostly be unsuitable for residential use, owing to noise associated with existing airport facilities, and would therefore be likely to be put to employment uses. Limited opportunities for residential development may, however, arise in some locations, for example to the north of Langley Green and Forge Wood. Any such opportunities will be assessed through a full review of the Local Plan in the event that safeguarding is removed.

4. CONCLUSIONS

- 4.1 The scope for Crawley Borough to provide housing to meet its needs is constrained by the fact that its administrative boundaries are drawn tightly around the urban area and neighbouring Gatwick Airport. Taken in combination with other major constraints this means that the borough's housing supply is highly dependent on a relatively limited supply of mainly medium-to-small sites, usually on Brownfield Land.
- 4.2 In these circumstances, and in line with the emphasis placed in national policy on the effective use of land, the proposed Local Plan approach seeks to maximise the potential yield from sites within the borough, and to realise the benefits of a more compact pattern of development as far as this may be achieved without causing serious harm to the town's key assets in terms of character, amenity, economic fabric, leisure offer and access to open space.
- 4.3 By means of this approach, as set out in the evidence provided in support of the submission draft Plan, a significant additional housing supply has been identified over and above that which was identified at the point of adoption of the current Plan in 2015. This will ensure that Crawley will be able to make a substantial contribution to meeting its own housing needs for a longer period into the future. At the same time the housing supply considered achievable by these means over the period 2021-37 falls significantly short of Crawley's identified level of housing need, and as such a 'supply led' housing requirement continues to be appropriate.